

TSD File Inventory Index

Date: April 27, 2000

Initial: CMK/ward

Facility Name: <u>Quincy Carbonyl Conversion (Raynolds Road - on fallow site)</u>		
Facility Identification Number: <u>OHV 055 352 5/2</u>		
A.1 General Correspondence		B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status	Y	.1 Correspondence
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement
.4 Financial Insurance (Sudden, Non Sudden)	Y	.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests		.2 Import/Export Notifications
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment
.1 Correspondence		.1 RFA Correspondence
.2 Reports		.2 Background Reports, Supporting Docs and Studies
A.4 Closure/Post Closure	Y	.3 State Prelim. Investigation Memos
.1 Correspondence	Y	.4 RFA Reports
.2 Closure/Post Closure Plans, Certificates, etc	Y	D. 2 Corrective Action/Facility Investigation
A.5 Ambient Air Monitoring		.1 RFI Correspondence
.1 Correspondence		.2 RFI Workplan
.2 Reports		.3 RFI Program Reports and Oversight
B.1 Administrative Record		.4 RFI Draft /Final Report

Total - 1

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		D.5 Corrective Action/Enforcement	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		E. Boilers and Industrial Furnaces (BIF)	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		F.1 Imagery/Special Studies (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
.4 CMS Draft/Final Report		G.1 Risk Assessment	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
D.4 Corrective Action Remediation Implementation		.4 Ecological - Administrative Record	
.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify in individual fieldwork schedule.*

**A.1 Public
Participation**

VERIFICATION OF RECEIPT OF PUBLIC REVIEW MATERIALS

NAME OF LIBRARY CONTACT, LIBRARY AND LOCATION:

Ms. Cox, Head Librarian
Circleville Public Library
165 East Main
Circleville, OH 43113

FACILITY NAME, LOCATION AND ID #:

Reynolds Metals Company
Reynolds Road
Ashville, OH

MATERIALS RECEIVED:

OH 055352512

Closure Plan
Public notice

DATE RECEIVED/MADE AVAILABLE TO PUBLIC:

8/8/84

SIGNATURE OF RECEIVING PARTY:

Olamae C. Cox

PLEASE RETURN (IN SELF-ADDRESSED, POSTAGE AND FEES PAID, ENVELOPE) TO:

U.S. Environmental Protection Agency
5HW-13
230 S. Dearborn Street
Chicago, IL 60604

Attention: Christine Klemme

RECEIVED
AUG 13 1984
WASTE MANAGEMENT
BRANCH

File ✓

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: September 17, 1984

SUBJECT: Comment Period for Reynolds Metals
Ashville, OH OHD055352512

FROM: Christine Klemme, EPA *Ch*
RAIU

TO: Paul DiMock

The comment period closed on September 10, 1984, for Reynolds Metals.

No public comments were received.

PUBLIC NOTICE

The United States Environmental Protection Agency (U.S. EPA) has received a certification of change in status from Reynolds Metals Company, Building Products Plant (RMCBPP), P.O. Box 12, Reynolds Road, Ashville, Ohio. The RMCBPP stored hazardous (as defined by federal law) waste in containers. This action will change the status of RMCBPP from a storage facility to a generator storing for fewer than 90 days (per 40 CFR 262.34). The status change for this facility was effected by removing hazardous waste stored for longer than 90 days and by limiting the present accumulation period to fewer than 90 days. The facility will be subject to the special provisions of 40 CFR 261.5 for small quantity generators in any calendar month if it generates less than 1000 kilograms of hazardous waste in that month.

The certification of change in status was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act, as amended. U.S. EPA required the certification of change in status when RMCBPP requested a change in status from a storage facility to a small quantity generator.

The certification and related background materials are available to the public at U.S. EPA, Waste Management Branch, 230 South Dearborn Street, 13th Floor, Chicago, Illinois 60604, (312) 886-3715, from 8:30 a.m. to 4:30 p.m., Monday through Friday. These materials also may be seen during business hours at the Circleville Public Library, 165 East Main, Circleville, Ohio (contact Ms. Cox, Head Librarian).

Public comments concerning the certification or this action are invited by U.S. EPA and will be accepted through September 10, 1984. Please send comments

to:

U.S. Environmental Protection Agency
230 South Dearborn Street
5HW-13
Chicago, Illinois 60604
ATTN: Christine Klemme

A.2 Part A/
Interim Status

Woodward-Clyde

Engineering & sciences applied to the earth & its environment

September 29, 1997

7E06515

Ohio EPA, DHWM
1800 Watermark Drive
P.O. Box 1049
Columbus, Ohio 43216-1049

Re: AmeriMark, Inc.
Ashville Plant, Ashville, Ohio
Transfer of Ownership
Notification of Regulated Waste Activity

RECEIVED
OCT 03 1997

DIVISION FRONT OFFICE
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

To whom it may concern:

On behalf of AmeriMark, Inc. Woodward-Clyde International Americas is issuing this letter to advise that on October 1, 1997 the AmeriMark Plant located in Ashville, Ohio, EPA ID Number OHD055352512, will be sold to Owens Corning. Enclosed is EPA form 8700-12 to transfer ownership and the EPA ID Number to Owens Corning. If you have questions or require additional information, please do not hesitate to call me at (440) 349-2708.

Sincerely,



Timothy L. Whipple
Project Manager
Woodward-Clyde International-Americas

cc: David Hanahs, AmeriMark, Inc.
Andrew Prokopetz, AmeriMark, Inc.
David Crowle, Owens Corning
U.S. EPA Region V, Waste Pesticides and Toxins Division ✓

Enclosures: EPA 8700-12 Notification Form





State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

RECEIVED
WMD RCRA
RECORD CENTER

MAY 14 1993

George V. Voinovich
Governor
Donald R. Schregardus
Director

May 4, 1993

Reynolds Metals Company
Attn: R. G. Johnson
Reynolds Road
Ashville, OH 43103

RE: EPA ID#: *OHD055352512* 

LOCATION of INSTALLATION: *Reynolds Rd*
Ashville, OH 43103

In response to your request of March 1993 the following information has been updated:

Contact: *R. G. Johnson (617)983-2571*

If you have any questions, please contact Beth Barrett at (614)644-2977.

Sincerely,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/bab

cc: U.S. EPA, Region V
Ohio EPA District Office



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

MAY 28 1982

R.F. Seip, Plant Manager
Reynolds Metals Company
Building Products Plant
Box 12
Ashville, Ohio 43103

RE: Interim Status Acknowledgement USEPA ID No. OHD055352512
FACILITY NAME: Reynolds Metals Company, Building Products Plant

Dear Mr. Seip:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Handwritten: PS 5/25/82

Enclosure

cc: Harry V. Helton, Vice President
L.C. Tropea

FACILITY NAME

REYNOLDS METALS COMPANY **BUILDING PROD PLT**

EPA ID NUMBER

OH055352512

FACILITY OPERATOR

REYNOLDS METALS CO., ~~ATTEN: D.C. TROPER~~

FACILITY OWNER

REYNOLDS METALS CO., ~~ATTEN: D.C. TROPER~~

FACILITY LOCATION

REYNOLDS ROAD
ASHVILLE OH 43103

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
T04	37000.00000	U
S04	385000.00000	G
S01	20000.00000	G

-----**KEY**-----

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE	* * UNIT OF * MEASURE	CODE
STORAGE:			* GALLONS	G
			* LITERS	L
CONTAINER	S01	G OR L	* CUBIC YARDS	Y
TANK	S02	G OR L	* CUBIC METERS	C
WASTE PILE	S03	Y OR C	* GALLONS PER DAY	U
SURFACE IMPOUNDMENT	S04	G OR L	* LITERS PER DAY	V
DISPOSAL:			* TONS PER HOUR	D
			* METRIC TONS\HOUR	W
INJECTION WELL	D79	G,L,U, OR V	* GALLONS\HOUR	E
LANDFILL	D80	A OR F	* LITERS\HOUR	H
LAND APPLICATION	D81	B OR Q	* ACRE-FEET	A
OCEAN DISPOSAL	D82	U OR V	* HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G OR L	* ACRES	B
TREATMENT:			* HECTARES	Q
			* POUNDS\HOUR	J
TANK	T01	U OR V	* KILOGRAMS\HOUR	R
SURFACE IMPOUNDMENT	T02	U OR V	* TONS PER DAY	N
INCINERATOR	T03	D,W,E, OR H	* METRIC TONS\DAY	S
OTHER	T04	J,R,N,S,U,V	*	

Please refer to the instructions for filling this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

I. Installation's EPA ID Number (Mark X in the appropriate box)

A. First Notification

X

B. Subsequent Notification
(Completion 6)

Installation's EPA ID Number

0 H D 0 5 5 3 5 2 5 1 2

II. Name of Installation (Include company and specific site name)

O w e n s C o r n i n g

III. Location of Installation (Physical address and P.O. Box or Route Number)

Street

R e y n o l d s R o a d

Street (Continued)

City or Town

A s h v i l l e

State

Zip Code

0 H 4 3 1 0 3 -

County Code

County Name

P i c k a w a y

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

City or Town

State

Zip Code

V. Installation Contact (Person to be contacted regarding waste activity) (State)

Name (Last)

H A N N A H S

(First)

D A V I D L

Job Title

P L N T M A N A G E R

Phone Number (Area Code and Number)

6 1 4 - 9 8 3 - 1 3 1 9

VI. Installation Contact Address (See instructions)

A. Contract Address Location (Mailing Address)

X

B. Street or P.O. Box

R E Y N O L D S R O A D

City or Town

A S H V I L L E

State

Zip Code

0 H 4 3 1 0 3 -

VII. Ownership (See instructions)

A. Name of Installation's legal owner

O w e n s C o r n i n g

Street, P.O. Box, or Route Number

O n e O w e n s C o r n i n g P a r k w a y

City or Town

T l e d o

State

Zip Code

0 H 4 3 6 5 9 -

Phone Number (Area Code and Number)

4 1 9 - 2 4 8 - 8 8 7 9

B. Land type

P

C. Ownership type

P

D. Compliance status

X

1 0 0 1 9 7

1 0 0 1 9 7

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

ID - For Official Use Only									

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to Instructions)

A. Hazardous Waste Activity		B. Used Oil Recycling Activities	
<p>1. Generator (See Instructions)</p> <p><input checked="" type="checkbox"/> a. Greater than 1000 kg/mo (2,200 lbs.)</p> <p><input type="checkbox"/> b. 100 to 1000 kg/mo (200-2,200 lbs.)</p> <p><input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)</p> <p>2. Transporter (Indicate Mode in boxes 1-5 below)</p> <p><input type="checkbox"/> a. For own waste only</p> <p><input type="checkbox"/> b. For commercial purposes</p> <p>Mode of Transportation</p> <p><input type="checkbox"/> 1. Air</p> <p><input type="checkbox"/> 2. Rail</p> <p><input checked="" type="checkbox"/> 3. Highway</p> <p><input type="checkbox"/> 4. Water</p> <p><input type="checkbox"/> 5. Other - specify _____</p>	<p><input type="checkbox"/> 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see Instructions.</p> <p>4. Hazardous Waste Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input type="checkbox"/> b. Other Marketers</p> <p><input type="checkbox"/> c. Boiler and/or Industrial Furnace</p> <p><input type="checkbox"/> 1. Smelter/Deferral</p> <p><input type="checkbox"/> 2. Small Quantity Exemption</p> <p>Indicate Type of Combustion Device(s)</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input type="checkbox"/> 3. Industrial Furnace</p> <p><input type="checkbox"/> 5. Underground Injection Control</p>	<p>1. Used Oil Fuel Marketer</p> <p><input type="checkbox"/> a. Marketer Directs Shipment of Used Oil to Off-Specification Burner</p> <p><input type="checkbox"/> b. Marketer Who First Claims the Used Oil Meets the Specifications</p> <p>2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)</p> <p><input type="checkbox"/> a. Utility Boiler</p> <p><input type="checkbox"/> b. Industrial Boiler</p> <p><input type="checkbox"/> c. Industrial Furnace</p> <p>3. Used Oil Transporter - Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> a. Transporter</p> <p><input type="checkbox"/> b. Transfer Facility</p> <p>4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> a. Process</p> <p><input type="checkbox"/> b. Re-refine</p>	

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

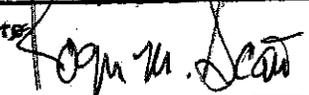
1 F 0 1 9	2 D 0 0 7	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number; See instructions.)

1	2	3	4	5	6
---	---	---	---	---	---

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: 	Name and Official Title (Type or print) Roger M. Scott, President - CEO	Date Signed 9-25-97
--	--	------------------------

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

ID - For Official Use Only

D. Description of Regulated Wastes (Additional Sheet)

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; Use this page only if you need to list more than 12 waste codes.)

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30
31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48
49	50	51	52	53	54
55	56	57	58	59	60
61	62	63	64	65	66
67	68	69	70	71	72
73	74	75	76	77	78
79	80	81	82	83	84
85	86	87	88	89	90
91	92	93	94	95	96
97	98	99	100	101	102
103	104	105	106	107	108
109	110	111	112	113	114
115	116	117	118	119	120



REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

November 1, 1984

RECEIVED
NOV 13 1984

WASTE MANAGEMENT
BRANCH

CERTIFIED MAIL - RETURN
RECEIPT REQUESTED

U. S. Environmental Protection Agency
Region 5
Solid Waste Program
230 South Dearborn Street
Chicago, Illinois 60604

OHD055352512 G

Re: Subsequent Notification Form
Ashville Construction Products Plant
Ashville, Ohio

Dear Sir:

It has recently come to my attention that our Subsequent Notification of August 27th was not properly completed. A copy of that submittal is attached for your reference.

Specifically, Item VI was completed indicating our Ashville Plant was involved in treatment, storage or disposal activities. This is not correct. This was a typographic error.

Our Ashville Plant does generate hazardous waste, but we are not currently involved in any treatment, storage or disposal of hazardous wastes.

Please find enclosed an amended notification form which supersedes all previously submitted notification forms. Reynolds requests that the Agency update its lists, computer records, etc. of hazardous waste management facilities to reflect the information contained in the revised notification.

If you have any questions or need additional clarification, please feel free to contact me at (804) 281-2918.

Sincerely,

C. R. Bent, P. E.
Environmental Engineer
Environmental Control Department

RECEIVED

NOV 13 1984

WMD-RAIU
EPA, REGION V

CRB/cyh

cc: Ohio Environmental Protection Agency



REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

August 27, 1984

CERTIFIED MAIL - RETURN
RECEIPT REQUESTED

U. S. Environmental Protection Agency
Region 5
Solid Waste Program
230 South Dearborn Street
Chicago, Illinois 60604

Re: Subsequent Notification Form
Ashville Construction Products Plant
Ashville, Ohio

Dear Sir:

Reynolds Metals Company has reviewed the hazardous waste management regulations and amendments, promulgated by the U. S. Environmental Protection Agency (hereafter the "Agency") pursuant to the Resource Conservation and Recovery Act. Our continuing review activities and the hazardous waste activities at our Ashville Construction Products Plant have led Reynolds to the conclusion that an updated notification is necessary for our facility. While we generate hazardous wastes, we are not currently involved in the storage, treatment, transportation or disposal of hazardous wastes.

Please find enclosed an amended notification form which supersedes all previously submitted notification forms. Reynolds hereby requests that the Agency update its lists, computer records, etc. of hazardous waste management facilities to reflect the information contained in the revised notification.

If you have any questions or need additional clarification, please feel free to contact me at (804) 281-2918.

Sincerely,

C. R. Bent, P. E.
Environmental Engineer
Environmental Control Department

CRB/yhc
cc: Ohio Environmental Protection Agency



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

OH055352512

REACKNOWLEDGEMENT

REYNOLDS METALS COMPANY
REYNOLDS ROAD
ASHVILLE

OH 43103

INSTALLATION ADDRESS

REYNOLDS ROAD
ASHVILLE

OH 43103

A

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 1 7 23 - 26 7 F 0 1 8 23 - 26	2	3	4	5	6
--	---	---	---	---	---

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

1. IGNITABLE (D001)
 2. CORROSIVE (D002)
 3. REACTIVE (D003)
 4. TOXIC (D004)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE <i>Rollin F. Seip</i>	NAME & OFFICIAL TITLE (type or print) ROLLIN F. SEIP PLANT MANAGER	DATE SIGNED 08-01-80
------------------------------------	---	-------------------------



REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

August 4, 1982

*Contact + Waste Codes
Changed 12-10-82 mhp*

CERTIFIED MAIL - RETURN
RECEIPT REQUESTED



RECEIVED

AUG 17 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

U. S. Environmental Protection Agency
RCRA Activity
Region 5
P. O. Box A3587
Chicago, Illinois 0690-3587

Re: Subsequent Notification for the
Ashville Building Products Plant
EPA I.D. No. OHD055352512
Ohio HWFAB No. 01-65-0040

G, TSD, PA

Gentlemen:

Please find attached a completed subsequent notification form for our Ashville Plant. This notification reflects our current status with regard to hazardous waste activities, and is designed to supercede all previously submitted notification forms for this facility.

If you have any questions please feel free to contact me at (804) 281-2918.

Sincerely,

Charles R. Bent
Staff Environmental Engineer
Environmental Control Department

CRB/yeh

cc: Ms. Debbie Unger
Ohio EPA

Mr. Thomas Crepean
Ohio EPA

DKT



Re: Hazardous Waste Activity Status
U.S. EPA I.D. No. OHD055352512 *G, PA-3, N*
Ohio Permit No. 02-65-0040
April 1, 1985

C.R. Bent
Reynolds Metals Co.
Ashville Ohio Div.
Richmond, Va. 23261

Dear C.R. Bent:

According to our records, your Ohio Hazardous Waste Installation & Operation Permit has expired. Prior to the expiration of that permit, you had informed and certified to the Ohio EPA that you no longer conducted hazardous waste activity for which a permit was required.

Therefore, this letter is to inform you that, based on the information you had submitted and an investigation by Agency staff, you will maintain the status of a generator only with less than 90 day storage.

You should continue to use the identification number assigned to you by the U.S. EPA for purposes of compliance with the Ohio EPA manifest, recordkeeping and reporting requirements for generators and transporters of hazardous waste as appropriate.

Should you have any questions concerning your current status, please contact the appropriate Ohio EPA District Office (see enclosed list).

Very truly yours,

A handwritten signature in cursive script that reads "Thomas E. Crepeau".

Thomas E. Crepeau, Manager
Data Management Section
Division of Solid and Hazardous Waste Management

TEC/ds

Enclosure

cc: U.S. EPA, Region V
HWFB
D.O.

SEP 24 1984

5HW-13

Mr. R.W. Winstead
Vice President - Corporate
Operations Services
Reynolds Metals Company
6601 West Broad Street
Richmond, Virginia 23261

RE: Withdrawal of Part A
(Storage under 90 days)
FACILITY NAME: Reynolds Metal Company
Building Products Plant
U.S. EPA ID #: OHD 055-352-512

Dear Mr. Winstead:

This is to advise you that your June 18, 1984, request for a change in status to that of a "generator accumulating waste on-site in compliance with 40 CFR 262.34," has been approved. For purposes of the Resource Conservation and Recovery Act (RCRA), the Building Products Plant is now considered a "generator of hazardous waste". As a generator, it is subject to the regulations contained in 40 CFR Part 262, and any other applicable regulations referenced therein. Since Building Products Plant is no longer considered a treatment, storage and/or disposal (TSD) facility, we are hereby rescinding our March 26, 1984, letter requesting submittal of a RCRA Part B application. We will return your RCRA Part A permit application for the Building Products Plant at your request.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with your previously submitted Part A application, you must (1) resubmit the Part A application, and (2) submit a complete Part B application, together within 30 days of such initiation. The Part B application would need to contain all of the information required by 40 CFR 270.14-270.16 (formerly 40 CFR 122.25).

Should you purpose to initiate storage of hazardous waste in a manner inconsistent with your previously submitted Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office prior to such initiation.

Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to submit a Part A or to contact our office as mentioned above would subject you to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation.

If you have questions, please contact Mr. Paul Dimock of my staff, at (312) 886-6182, for assistance.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: B.C. Goldman, Plant Manager
Reynolds Metals Company

Tom Carlisle
Ohio Environmental Protection Agency

bcc: Part A File

5HW-13:PDimock:PGrace:9-19-84

INITIALS	TYPYST <i>PDY</i> <i>9/19/84</i>	AUTHOR <i>FEND</i> <i>9-19-84</i>	STU #1 CHIEF	STU #2 CHIEF <i>DJB</i> <i>9-19-84</i>	STU #3 CHIEF	OPS CHIEF <i>WDM</i> <i>9/20/84</i>	WMB CHIEF <i>KVK</i> <i>9/21/84</i>	W.D. CARLISLE DIRECTOR
DATE								

9/20/84 *9/21*
Csp

AUG 3 1984

5HW-13

Mr. R.M. Winstead
Vice President - Corporate
Operations Services
Reynolds Metals Company
6601 West Broad Street
Richmond, Virginia 23261

RE: Withdrawal of Part A
(Storage under 90 days)
FACILITY NAME: Reynolds Metal Company
Building Products Plant
U.S. EPA ID #: OHD 055-352-512

Dear Mr. Winstead:

This is to advise you that through an administrative error, our letter dated July 16, 1984, approving your change in status was sent to you prematurely and is hereby rescinded.

Our regulations prescribed that your change in status be public noticed with a 30-day comment period. This requirement is being expedited by us.

If there are no comments at the end of the comment period, a letter approving your change in status will be reissued.

I apologize for any inconvenience this may have caused.

Sincerely yours,

Daniel J. Banaszek, Chief
State Technical Unit # 2
Waste Management Branch

cc: D.C. Goldman, Plant Manager
Reynolds Metals Company

Tom Carlisle
Ohio Environmental Protection Agency

bcc: Part A File

5HW-13:PDimock:PG:8-3-84

DATE
INITIALS

Shane
8/3/84
TYPYST

AUTHOR
RE
8-3-84

STU #1
CHIEF

STU #2
CHIEF
DJB
8-3-84

STU #3
CHIEF

TPS
CHIEF

WMB
CHIEF

WMD
DIRECTOR

JUL 16 1984

SNW-13

Mr. R. W. Winstead
Vice President - Corporate
Operations Services
Reynolds Metals Company
6601 West Broad Street
Richmond, Virginia 23261

*Classified
TSD*

RE: Withdrawal of Part A
(Storage under 90 days)
FACILITY NAME: Reynolds Metal Company
Building Products Plant
U.S. EPA ID #: OHD 055-352-512

Dear Mr. Winstead:

This is to advise you that your June 18, 1984, request for a change in status to that of a "generator accumulating waste on-site in compliance with 40 CFR 262.34," has been approved. For purposes of the Resource Conservation and Recovery Act (RCRA), the Building Products Plant is now considered a "generator of hazardous waste". As a generator, it is subject to the regulations contained in 40 CFR Part 262, and any other applicable regulations referenced therein. Since Building Products Plant is no longer considered a treatment, storage and/or disposal (TSD) facility, we are hereby rescinding our March 26, 1984, letter requesting submittal of a RCRA Part B application. We will return your RCRA Part A permit application for the Building Products Plant at your request.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with your previously submitted Part A application, you must (1) resubmit the Part A application, and (2) submit a complete Part B application, together within 30 days of such initiation. The Part B application would need to contain all of the information required by 40 CFR 270.14-270.16 (formerly 40 CFR 122.25).

Should you propose to initiate storage of hazardous waste in a manner inconsistent with your previously submitted Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office prior to such initiation.

Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to submit a Part A or to contact our office as mentioned above would subject you to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation.

If you have questions, please contact Mr. Paul Dimock of my staff, at (312) 886-6182, for assistance.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: D.C. Goldman, Plant Manager
Reynolds Metals Company

Tom Carlisle
Ohio Environmental Protection Agency

bcc: Part A File ✓

5HW-13:PDimock:PG:7-9-84

INITIALS	TPYST PKS 7-9-84	AUTHOR for Ken Stecher 7/9/84	STU #1 CHIEF	STU #2 CHIEF for Ken Stecher 7/9/84	STU #3 CHIEF	TPS CHIEF WPKW 7/10/84	WMB CHIEF KJK 7/13/84	DIRECTOR
DATE								

@MR 7/10 7/11/84



REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

July 11, 1984

CERTIFIED MAIL - RETURN
RECEIPT REQUESTED

Mr. Paul E. Dimock
U. S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Ashville Building Products Plant
Ashville, Ohio
EPA I. D. Number: OHD055352512

ETS, PA

Dear Mr. Dimock:

Please find attached an executed copy of the form you recently sent to me. Our Ashville Plant currently handles all hazardous wastes in accordance with 40 CFR 262.34. Wastes are not accumulated beyond the 90-day time limit.

If you have any questions or need further clarification, please feel free to contact me at (804) 281-2918.

Sincerely,

C. R. Bent, P. E.
Environmental Engineer
Environmental Control Department

CRB/ych
Attachment

cc: R. G. Johnson
D. C. Goldman
L. C. Tropea
R. K. Rhinehart

RECEIVED

JUL 18 1984

**WMD-RAIU
EPA, REGION V**



REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

June 18, 1984

CERTIFIED MAIL - RETURN
RECEIPT REQUESTED

Thomas Crepeau
State of Ohio EPA-DHMM
361 East Broad Street
P. O. Box 1049
Columbus, Ohio 43216

Re: Withdrawal of Hazardous Waste
Permit Application for
Reynolds Metals Company
Building Products Plant
Ashville, Ohio 43103
EPA ID#: OHD-055-352-512 G, TSD, PA

Dear Mr. Crepeau:

Please be advised that the Reynolds Building Products Plant is not engaged in any permitted hazardous waste activity. The plant does not treat, store or dispose of hazardous wastes nor is it involved in underground injection of hazardous wastes. The plant is only a generator of hazardous wastes.

Your Division is hereby respectfully requested to withdraw our previously submitted Part A Permit Application. Reynolds will not be submitting a Part B Permit Application.

If you have any questions or need further clarification, please feel free to contact C. R. Bent at (804) 281-2918.

Sincerely,

R. W. Winstead
Vice President
Corporate Operations Services

/ych

cc: D. C. Goldman
R. G. Johnson
R. K. Rhinehart
L. C. Tropea

RCRA Activities
Part B Permit Application
U. S. EPA, Region V
P. O. Box A3587
Chicago, Illinois 60609-3587

RECEIVED

JUN 28 1984

WMD-RAIU
EPA, REGION V

Ohio EPA

CERTIFICATION STATEMENT

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Permit Appl. No. 01-65-0040

Reynolds Metals Company
Building Products Plant
 Facility Name

R.W. Wristead
 Signature of Executive Officer

Vice President
 Title

June 18, 1984
 Date

WHO SHOULD SIGN THE CERTIFICATION STATEMENT?

- A. For a corporation: By a principal executive officer of at least the level of vice president;
- B. For partnership or sole proprietorship: By a general partner or the proprietor, respectively; or
- C. For a municipality, State, Federal or other public facility: By either a principal executive officer or ranking elected official.

Note: Establishment of a hazardous waste facility without an effective permit is prohibited pursuant to Sections 3734.02 and 3734.11 of the Ohio Revised Code.

0427R

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAR 26 1984

Mr. D. C. Goldman
Plant Manager
Reynolds Metals Company
P.O. Box 12
Ashville, Ohio 43103

RE: Reynolds Metals Company
Building Products Plant
Ashville, Ohio
EPA ID#: OHD-055-352-512

Dear Mr. Goldman:

By now you should have received an acknowledgment of our receipt of the Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act (RCRA) permit program.

Accordingly, this letter constitutes the next step in the forming toward issuance or denial of an RCRA permit. Under the au 270.10, this is a formal request for submittal of Part B of the cation for the above-referenced facility.

Enclosed is a copy of 40 CFR 270 which lists the items require permit application for the facility. The Part B application m in quintuplicate and postmarked no later than October 26, 1984 number each page of the application including all attachments tions, etc.). A statement identical to the one stated in 40 C accompany the application and all additional submittals.

Send two copies to:

RCRA ACTIVITIES
Part B Permit Application
U.S. EPA, Region V
P.O. Box A3587
Chicago, Illinois 60609-3587

Send three copies

Thomas Crepeau
State of Ohio EPA-
361 East Broad Str
P.O. Box 1049
Columbus, Ohio 43

We will coordinate review of the application with the Ohio Env Protection Agency and the Hazardous Waste Facility Approval Bo committed to conducting the RCRA permit process as efficiently. Consequently, I suggest you contact Paul Dimock of my staff, a as you begin preparing your application. Mr. Dimock will be a discuss specific needs of your application or to meet with you

P23 6913328
Paul Dimock
RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED 5HW-13
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO		D.C. Goldman	
STREET AND NO.		Box 12	
P.O. STATE AND ZIP CODE		Ashville, OH 43103	
POSTAGE		\$	
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	c	
	SPECIAL DELIVERY	c	
	RESTRICTED DELIVERY	c	
	OPTIONAL SERVICES	c	
	RETURN RECEIPT SERVICE	c	
SHOW TO WHOM AND DATE DELIVERED		c	
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY		c	
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY		c	
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY		c	
TOTAL POSTAGE AND FEES		\$	
POSTMARK OR DATE		CHICAGO ILLINOIS 1984	

PS Form 3800, Apr. 1976

Failure to furnish the complete Part B permit application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR 270.10.

Information you submit in the Part B permit application can be disclosed to the public, according to the Freedom of Information Act and U.S. Environmental Protection Agency (U.S. EPA) Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. U.S. EPA will review business confidentiality claims under regulations at 40 CFR Part 2, and will later request substantiation of any claims. Please review these rules carefully before making a claim.

If you claim parts of the application as confidential, please provide us and the State with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

We have also enclosed a copy of 40 CFR Part 264 which includes technical standards for the operation of treatment, storage and disposal facilities. These standards would become applicable upon issuance of an RCRA permit to the facility by U.S. EPA. Also enclosed for your use is a copy of our "Guidance For Permit Application Preparation" which should help you avoid the typical deficiencies found in previous application submittals.

We look forward to receiving your Part B permit application.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures: 40 CFR 270
40 CFR 264
Guidance for Permit Application Preparation

cc: Tim Lawrence, OEPA
Phil Scott, HWFAB

bcc: Permit Contact
Dan Banaszek

5HW-13:DBanaszek:pg:3/6/84

INITIALS	<i>pk</i>		CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	DIRECTOR
DATE	<i>3/6/84</i>	<i>PEN</i>		<i>DJB</i>		<i>for HC</i>	<i>KH</i>	
		<i>3-14-84</i>		<i>3/23/84</i>		<i>3/26/84</i>	<i>3/26/84</i>	

BMR 3/23/84



REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

July 5, 1983

RECEIVED
OHIO EPA

JUL 8 1983

DIV. HAZARDOUS
MATERIALS MANAGEMENT

CERTIFIED MAIL - RETURN RECEIPT
RECEIPT REQUESTED

Mr. Thomas Crepeau
Permits
Ohio Environmental Protection Agency
361 East Broad Street
Columbus, OH 43215

Re: Supplemental Information for
Revised Hazardous Waste
Part A Permit Application for
Ashville Construction Products Plant
EPA I. D. Number OHD055352512
Ohio HWF AB No. 01-65-0040

Dear Mr. Crepeau:

In recent discussions with Ms. Kim Griffith of your staff, it has come to my attention that there is an error in my letter to you dated May 10, 1983. A copy of that letter is attached for your reference.

In paragraph (3) of that letter, I made reference to the fact that our paint waste was at various times identified as F017, F003 and D007. Unfortunately, the D007 was a typographical error and the EPA hazardous waste number D008 should have been used. As previously noted, none of our paint wastes left the Ashville Plant identified as D008. The wastes were disposed of as F017 and F003 waste, and the D008 designation was merely reflecting our interpretation of the regulatory changes that were taking place during this time.

I apologize for any confusion this error may have caused your office and trust this last bit of information will be all that is needed to make the appropriate changes to our hazardous waste Part A permit application.

If you have any additional questions, please feel free to contact me at (804) 281-2918.

Sincerely,

C. R. Bent
Environmental Engineer
Environmental Control Department

CRB/cjw
Attachment



REYNOLDS ALUMINUM
REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

May 10, 1983

CERTIFIED MAIL - RETURN
RECEIPT REQUESTED

Mr. Thomas Crepeau
Permits
Ohio Environmental Protection Agency
361 East Broad Street
Columbus, Ohio 43215

RECEIVED
OHIO EPA
JUL 8 1983
DIV. HAZARDOUS
MATERIALS MANAGEMENT

Re: Additional Information for
Revised Hazardous Waste
Part A Permit Application for
Ashville Construction Products Plant
EPA I. D. Number OHD055352512
Ohio HWFAB No. 01-65-0040

Dear Mr. Crepeau:

It has come to my attention that your office has raised several questions concerning our August 4, 1982, letter to your office. A copy of that letter including its attachments is attached for your review.

The following should clarify the questions raised by your office.

- (1) Your first question concerned the process description on our revised permit application. When we submitted our revised permit application on August 4th we inadvertently included a comment on page 2 of 5, Item III. This process description was part of our original submittal and should NOT have been included as part of the revised permit application. I apologize for any inconvenience or confusion this may have caused your office. A corrected copy of our revised application is attached for your records.
- (2) Your second question concerned our rationale for removing the "S04" and "T04", i.e. wastewater treatment unit, designation from our original permit application. When the U. S. EPA and Ohio EPA promulgated their hazardous waste programs there was a certain amount of uncertainty as to the exact interpretation of many of those regulations. One such area of uncertainty was the regulatory implication of "wastewater treatment unit." This uncertainty resulted in Reynolds needlessly submitting a permit application for our wastewater treatment plant and the Ohio EPA erroneously issuing a permit.

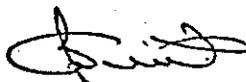
Mr. Thomas Crepeau
May 10, 1983
Page 2

Our wastewater treatment plant meets the definitions in 40 CFR 260.10 and Rule 3745-50-10(A)(90) as amended. Specifically; a) our wastewater treatment plant is regulated under Section 402 of the Clean Water Act, b) our wastewater treatment plant's influent is a hazardous waste, and c) our wastewater treatment plant's influent is impounded in a stationary in-ground lined concrete tank. Having met the requirements of a wastewater treatment unit, we are exempt from the permitting requirements pursuant to both U. S. EPA and Ohio EPA regulations.

- (3) The last question concerns the EPA Hazardous Waste Number designated for our plant wastes. Originally, our paint wastes were identified as paint wastes (F017) and we notified the U. S. EPA accordingly. The U. S. EPA and Ohio EPA subsequently removed paint wastes (F017) from their list of hazardous wastes, whereupon Reynolds designated our paint wastes as containing waste solvents (F003). The plant, during this transition from F017 to F003, used, for internal purposes and only for a short time, the EPA Hazardous Waste Number of D007. In short, the waste identified as F017, D007 and F003 are, in fact, the same waste from the same process and the use of different EPA Hazardous Waste Numbers was merely reflecting regulatory changes.

I trust this fully and completely answers all your questions. If I can be of further assistance, please feel free to contact me at (804) 281-2918.

Sincerely,



C. R. Bent
Staff Environmental Engineer
Environmental Control Department

CRB/ych



REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

August 17, 1982

CERTIFIED MAIL - RETURN
RECEIPT REQUESTED

U. S. Environmental Protection Agency
Ms. Elizabeth Utley
RCRA Activity
Region 5
P. O. Box A3587
Chicago, Illinois 0690-3587

RECEIVED
8/23/82

RECEIVED

AUG 23 1982

WASTE MANAGEMENT BRANCH
EPA REGION V

Re: Substantiating Information for
Revised Hazardous Waste Part A
Permit Application for the Ashville
Building Products Plant
EPA I.D. No. OHD055352512 TSD, G, PA
Ohio HWFAB No. 01-65-0040

Dear Ms. Utley:

Please find attached the following documents for your review:

- (1) Our original Hazardous Waste Part A Permit Application and cover letter. Please note that the cover letter eluded to the confusion surrounding the new RCRA regulations. Also note that the cover letter was to be made a part of our permit application.

The surface impoundments identified in this application should have been identified as tanks. As noted below, these tanks are part of a wastewater treatment unit and as such, should not have been part of our original permit application.

- (2) Ohio EPA's inspection followup letter dated June 18, 1982. Please note that Ohio EPA was, after inspecting our facility, in agreement with the appropriateness of applying the "wastewater treatment unit" definition to our operation. Ohio EPA even went as far as suggesting changes to our revised permit application.
- (3) Our revised Hazardous Waste Part A Permit Application and cover letter. I apologize for any confusion the omission of the cover letter caused your office.

DKT

Reynolds, in conjunction with the U. S. EPA, Washington, D. C., and the Ohio EPA have closely and carefully scrutinized the applicability of the wastewater treatment unit definition pursuant to 40 CFR 260.10. We believe the applicability of this definition to our operation clearly exempts us from permitting requirements pursuant to 40 CFR 264.1(b)(6). Our revised hazardous waste Part A permit application, of course, reflects those regulatory requirements.

Please advise if I can be of further assistance, or if I can provide additional clarification. My telephone number is (804) 281-2918.

Sincerely,



C. R. Bent
Staff Environmental Engineer
Environmental Control Department

CRB/ych

Attachments

cc: Mr. Thomas Crepean
Ohio EPA

Ms. Debbie Unger
Ohio EPA



REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261
1981 September 25

*reg: Water Enforcement
cc: Newman
Ulrich Gene
J. Harrison
Klepitael
Constantinos*

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. James F. McAvoy, Director
Ohio Environmental Protection Agency
Box 1049
361 E. Broad Street
Columbus, Ohio 43216

RECEIVED

OCT -1 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

Re: Delegation of Authority to
Execute and Submit Reports

Dear Mr. McAvoy:

Various permits issued or to be issued to Reynolds Metals Company under State and Federal environmental regulations require that monitoring reports be submitted by the Company to various State agencies and/or the U. S. Environmental Protection Agency. Pursuant to the Ohio NPDES Permit Regulations and Title 40 of the Code of Federal Regulations, Part 122.6, these reports must be signed by a principal executive officer of the Company of vice presidential level or above, or by an individual or position authorized by such an officer. A recent change in operational titles at our Ashville Building Products Plant requires us to notify you that the Plant Manager's title has been changed to Business Unit Manager. This letter, therefore, serves as delegation of authority and responsibility to the individual occupying the following position to sign and submit such reports for his facility and to affirm that the information contained in them is true, complete and accurate:

Business Unit Manager
Ashville Building Products Plant
Reynolds Metals Company
P. O. Box 12
Ashville, Ohio 43103
(614) 983-2571

This authorization supersedes all previous authorizations granted relative to this facility. A copy of this authorization is being sent to the Regional Administrator, EPA Region V.

Very truly yours,

Temple N. Brown

Temple N. Brown
Vice President
Corporate Operations Services

cc: D. C. Goldman - RMCo

~~Regional Administrator~~
U. S. EPA Region V
230 South Dearborn Street
Chicago, Illinois 60604

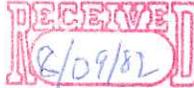


REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

August 4, 1982

CERTIFIED MAIL - RETURN
RECEIPT REQUESTED



RECEIVED

AUG 9 1982

WASTE MANAGEMENT BRANCH
EPA REGION V

U. S. Environmental Protection Agency
RCRA Activity
Region 5
P. O. Box A3587
Chicago, Illinois 0690-3587

Re: Revised Hazardous Waste Part A
Permit Application for the
Ashville Building Products Plant
EPA I.D. No. OHD055352512
Ohio HWF AB No. 01-65-0040

G, TSD, PA

Gentlemen:

Please find attached a photocopy of our cover letter to the Ohio Environmental Protection Agency and a revised Part A hazardous waste permit application for our Ashville Plant.

This revised permit application is designed to supercede all previously submitted Part A permit applications for this facility.

If you have any questions or need further clarification please feel free to contact me at (804) 281-2918.

Sincerely,

Charles R. Bent
Staff Environmental Engineer
Environmental Control Department

CRB/ych

cc: Ms. Debbie Unger
Ohio EPA

Mr. Thomas Crepean
Ohio EPA

DKT

STATE OF OHIO

HAZARDOUS WASTE FACILITY APPROVAL BOARD

RECEIVED
NOV 19 1981
WASTE MANAGEMENT
BRANCH

In the Matter of: :

Reynolds Metals Company :
Building Products Plant :
Box 12 :
Ashville, OH 43103 :

Permit No. 01-65-0040

Applicant/Permittee :

The operator of the below- :
referenced hazardous waste :
facility :

Reynolds Metals Company :
Reynolds Road :
Ashville, Ohio 43103 :

HAZARADOUS WASTE FACILITY
APPROVAL BOARD
NOV 25 1981
ENTERED BOARD'S JOURNAL

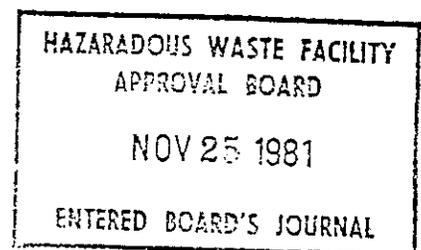
Facility :

Pursuant to Section 3734.05(D) of the Revised Code, The Hazardous Waste Facility Approval Board (Board) makes the following Findings and Conclusions and issues a Hazardous Waste Facility Installation and Operation Permit (Permit).

FINDINGS AND CONCLUSIONS

1. The Applicant has submitted to the Board a completed permit application, stating the facility was in operation immediately prior to October 9, 1980, and has paid the required permit fee.
2. The Ohio Environmental Protection Agency (Agency) and/or the United States Environmental Protection Agency has inspected the facility and has prepared an Interim Status Standards Survey (survey).
3. All public comments timely received have been reviewed, evaluated and considered by the Board and the Agency for their relevancy and materiality.
4. The Agency has reviewed and considered the information on the permit application, the results of the survey, the public comments, and other pertinent material and has concluded that the facility was in substantial compliance, as determined by the Director of Environmental Protection, with applicable statutes and rules in effect immediately prior to October 9, 1980.

5. The Agency has informed the Applicant of the requirements of applicable hazardous waste rules of which it was not in compliance.
6. The Agency has recommended to the Board that a permit be issued to the facility.
7. Review and consideration of the information on the permit application, the results of the survey, the public comments, recommendations and comments by the Agency, and other pertinent material regarding the Applicant and the facility is sufficient to determine whether the facility meets the requirements for permit issuance set forth in Section 3734.05(D) of the Revised Code.
8. The staff of the Board has reviewed and considered the information on the permit application, the results of the survey, the public comments, the recommendation and comments by the Agency, and other pertinent material regarding the Applicant and the facility and has recommended to the Board that a permit be issued.
9. Pursuant to Resolution No. 26 -81, passed September 9 , 1981, the Board found that the facility:
 - a. Was in operation immediately prior to October 9, 1980,
 - b. Was in substantial compliance, as determined by the Director of Environmental Protection, with applicable statutes and rules in effect immediately prior to October 9, 1980,
 - c. Submitted a completed permit application, and
 - d. Has demonstrated to the Board that its operation after October 9, 1980 will comply with applicable performance standards adopted by the Director of Environmental Protection pursuant to division (D) of Section 3734.12 of the Revised Code.
10. Pursuant to such Resolution, the Board resolved and approved that a permit be issued with such standard terms and conditions set forth in the document entitled "Terms and Conditions" attached to the Resolution and such special terms and conditions as were approved by the Board.
11. The terms and conditions referenced in Finding Number 10 above, are attached hereto and incorporated herein.
12. Resolution No. 21-81, passed on August 26, 1981 and entered into the Journal of the Board on September 1, 1981, authorizes the Coordinator of the Board to:



- a. Authorize the staff of the Board to issue to the facilities the Hazardous Waste Facility Installation and Operation Permits approved for issuance by resolution of the Board, and
- b. Have signing authority indicating that such action has been approved by the Board.

NOW THEREFORE, A HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT IS ISSUED TO THE Applicant for the facility, subject to the Terms and Conditions attached hereto and incorporated herein.

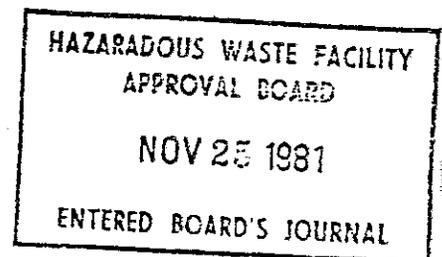
FOR THE BOARD, BY
ORDER OF THE BOARD

Peggy J. Vince

November 25, 1981

Entered into the Journal of the Board on Nov. 25, 1981 by

Madeline Samson/sec.



FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> <i>(Read the "General Instructions" before starting.)</i>		I. EPA I.D. NUMBER F OHD055352512	
LABEL ITEMS I. EPA I.D. NUMBER III. FACILITY NAME V. FACILITY MAILING ADDRESS VI. FACILITY LOCATION		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		*	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP REYNOLDS METALS COMPANY BUILDING PRODUCTS PLANT

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)		
2 D. C. GOLDMAN, PLANT MANAGER		614	983	2571

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3 BOX 12			
B. CITY OR TOWN		C. STATE	D. ZIP CODE
4 ASHVILLE		OH	43103

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 REYNOLDS ROAD			
B. COUNTY NAME			
PICKAWAY			
C. CITY OR TOWN		D. STATE	E. ZIP CODE
6 ASHVILLE		OH	43103
F. COUNTY CODE (if known)			

RECEIVED
 8/2/82

RECEIVED
 AUG 2 1982

WASTE MANAGEMENT BRANCH
 EPA REGION V

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST		B. SECOND	
7	3444 (specify)	7	3354 (specify) Aluminum Extruded Products
C. THIRD		D. FOURTH	
7	3479 (specify) Coating, Engraving, and Allied Services, N E C	7	(specify)

VIII. OPERATOR INFORMATION

A. NAME		B. Is the name listed in Item VIII-A also the owner?
REYNOLDS METALS COMPANY, ATTN: L. C. TROPEA		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box. If "Other", specify.)		D. PHONE (area code & no.)
F - FEDERAL M - PUBLIC (other than federal or state) S - STATE O - OTHER (specify) P (specify)		804 281 3871
E. STREET OR P.O. BOX		
6601 WEST BROAD STREET		
F. CITY OR TOWN		G. STATE H. ZIP CODE
RICHMOND		VA 23261
		IX. INDIAN LAND Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)		D. PSD (Air Emissions from Proposed Sources)	
E T I	C - 402 * CD	E T I	
15 16 17 18		15 16 17 18	
B. UIC (Underground Injection of Fluids)		E. OTHER (specify)	
E T I		E T I	(specify) See Attachment A
15 16 17 18		15 16 17 18	
C. RCRA (Hazardous Wastes)		F. OTHER (specify)	
E T I		E T I	(specify)
15 16 17 18		15 16 17 18	

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Operations consist of residential and commercial siding, roll forming of aluminum and extruding aluminum plus extrusion painting and coil coating activities.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
T. N. Brown, Vice President Corporate Operations Services	<i>Temple N. Brown</i>	8-3-82

COMMENTS FOR OFFICIAL USE ONLY

E	
15	

REYNOLDS METALS COMPANY
BUILDING PRODUCTS PLANT
ASHVILLE, OHIO
OH D055352512

Form 1, Item X

Existing Environmental Permits

E. Other

Ohio EPA	0165000045	B001
"	0165000045	B002
"	0165000045	B003
"	0165000045	B004
"	0165000045	B005
"	0165000045	B007
"	0165000045	B010
"	0165000045	B011
"	0165000045	P001
"	0165000045	P002
"	0165000045	P003
"	0165000045	P004
"	0165000045	P005
"	0165000045	P007
"	0165000045	P008
"	0165000045	P009
"	0165000045	R001
"	0165000045	R002
"	0165000045	K001
"	0165000045	K002

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

T04: Treatment of conversion coating process water through the reduction of soluble hexavalent chromium and the precipitation of trivalent chromium as a sludge. There are no cyanides associated with the generation or treatment of our conversion coating process water.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																	
W	O	H	D	0	5	5	3	5	2	5	1	2	T/A	C	1	W	DUP										T/A	C	2	DUP
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26					

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES															
				1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
				27	28	29	30	27	28	29	30	27	28	29	30	27	28	29	30
1	F019	500	T	S	0	1													
2	F003	60	T	S	0	1													
3																			
4																			
5																			
6																			
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25																			
26																			

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)														
F	O	H	D	0	5	5	3	5	2	5	1	2	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)					
8	2	5	9	1	7	3	9	4	3	5	0
65	66	67	68	69	71	72	74	75	76	77	78

VIII. FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER						2. PHONE NO. (area code & no.)							
3. STREET OR P.O. BOX						4. CITY OR TOWN			5. ST.		6. ZIP CODE		
G													

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

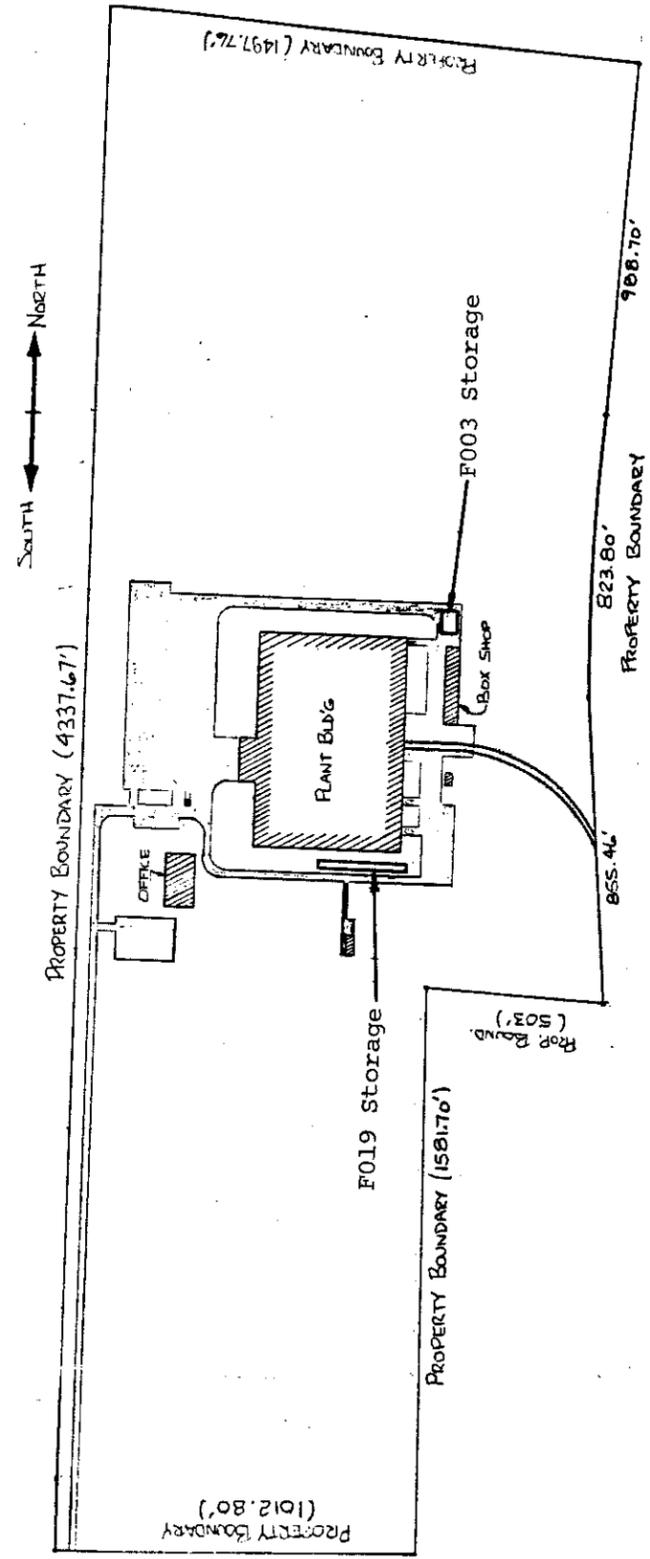
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
T. N. Brown	Temple N. Brown	8-3-82

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

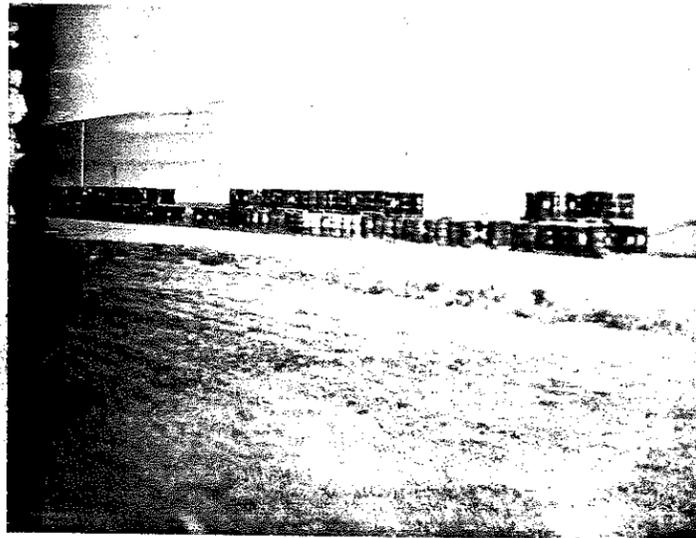
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

V. FACILITY DRAWING (see page 4)

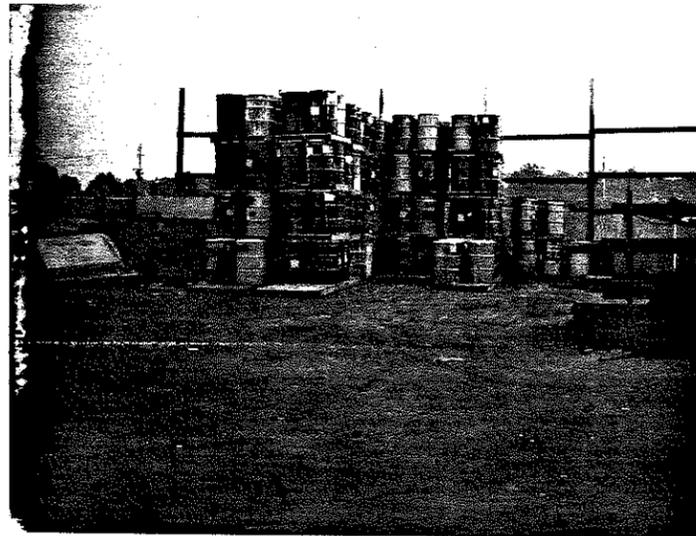


FACILITY DRAWING

- LEGEND
- PAVING
 - RAILROAD TRACK

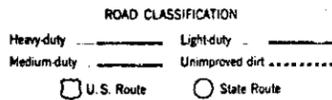
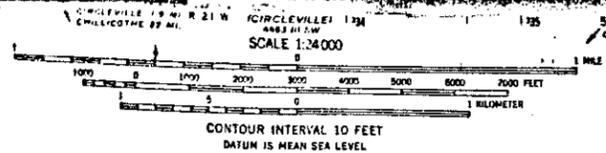


REYNOLDS METALS COMPANY
BUILDING PRODUCTS PLANT
ASHVILLE, OHIO
OH DO55352512
7/13/82
FO19 Storage



REYNOLDS METALS COMPANY
BUILDING PRODUCTS PLANT
ASHVILLE, OHIO
OH DO55352512
FO03 Storage
7/13/82

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY



THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, WASHINGTON, D. C. 20242
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

Revisions shown in purple compiled in cooperation with
State of Ohio agencies from aerial photographs taken
1970. This information not field checked

ASHVILLE, OHIO
N 3937.5--W 8252.5/7.5
1958
PHOTOREVISED 1970
AMS 4463 III NW-SERIES V 822

FORM 1
GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERAL INFORMATION
 Consolidated Permits Program
 (Read the "General Instructions" before starting.)

LABEL ITEMS

EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

I. EPA I.D. NUMBER

S	F	O	H	D	0	5	5	3	5	2	5	1	2	3	D
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		*	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP REYNOLDS METALS COMPANY, BUILDING PRODUCTS PLT.

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)		
2	R. F. SEIP, PLANT MANAGER	614	983	2571

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3	BOX 12		
B. CITY OR TOWN		C. STATE	D. ZIP CODE
4	A SH V I L L E	OH	4 3 1 0 3

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER					
5	REYNOLDS ROAD				
B. COUNTY NAME					
PICKAWAY					
C. CITY OR TOWN			D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6	A SH V I L L E		OH	4 3 1 0 3	129

FORM 3 RCRA

 U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
 Consolidated Permits Program
 (This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER
 S O H D 0 5 5 3 5 2 5 1 2 3 1
 T/A C
 13 14 15

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24	29

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR.	MO.	DAY
71	7	1

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY
71		

B. REVISED APPLICATION (place an "X" below and complete Item I above)

1. FACILITY HAS INTERIM STATUS

2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 4	385,000 000	G		7				
2	T 0 4	37,000 000	U		8				
3	S 0 1	20,000 000	G		9				
4					10				

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

T04: Treatment of conversion coating process water through the reduction of soluble hexavalent chromium and the precipitation of trivalent chromium as a sludge. There are no cyanides associated with the generation or treatment of our conversion coating process water.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE		CODE	METRIC UNIT OF MEASURE		CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

664

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY														
1	2	3	4	5	6	7	8	9	10	11	12	T/A	C	1	2	3	4	5	6	7	8	9	10	11	12	T/A	C
W	O	H	D	0	5	5	3	5	2	5	1	2	3	1	W	DUP										2	DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																							
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																			
23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50
1	F 0 1 9	26,250 gpd	T	S 0 4	T 0 4																						
2	F 0 1 9	500 gpd	T	S 0 1																							
3	F 0 1 7	600 gpd	T	S 0 1																							
4																											
5																											
6																											
7																											
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23																											
24																											
25																											
26																											

IV. DESCRIPTION OF HAZARDOUS WASTE *(continued)*

(continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)															
S	F	O	H	D	0	5	5	3	5	2	5	1	2	3	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*. **FG A/55**

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground-level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*. **FG A/55**

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)							
8	2	5	9	1	7	0	3	9	4	3	0	5	0
65	66	67	68	69	71	72	74	75	76	77	79		

VIII. FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER										2. PHONE NO. (area code & no.)				
3. STREET OR P.O. BOX					4. CITY OR TOWN					5. ST.		6. ZIP CODE		

IX. OWNER CERTIFICATION

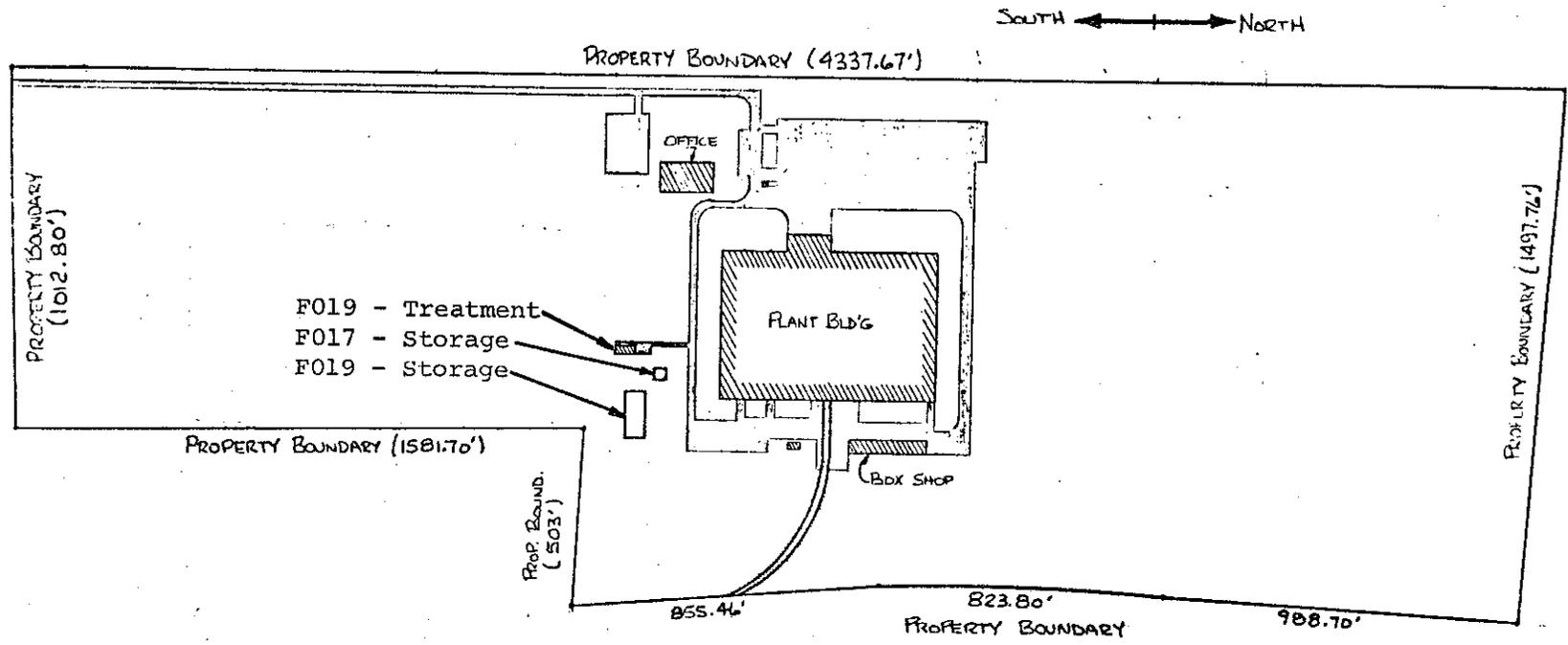
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Harry V. Helton		1980 November 17

X. OPERATOR CERTIFICATION

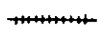
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED



FACILITY DRAWING

LEGEND

-  - PAVING
-  - RAILROAD TRACK

664

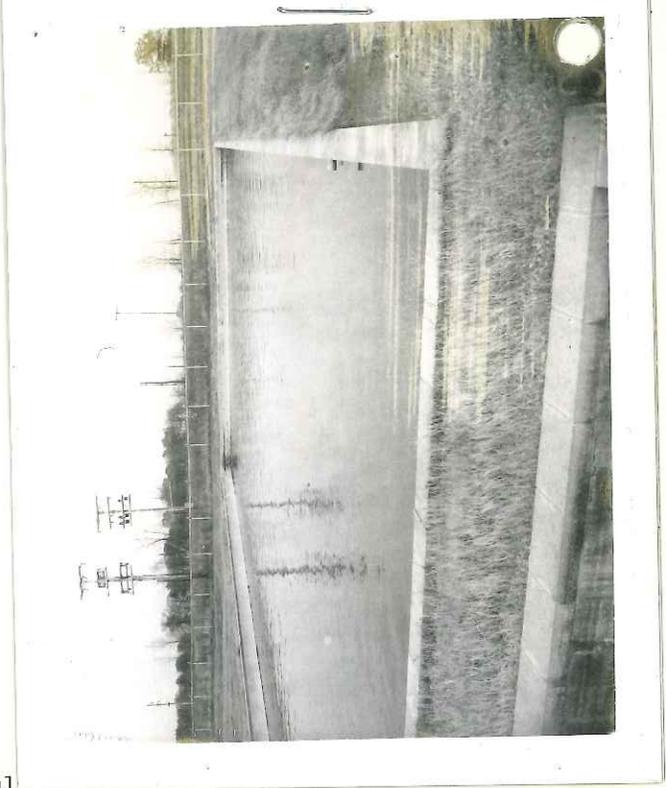
ATTACHMENT A

Form 1, Item X

Existing Environmental Permits

E. Other

Ohio EPA	0165000045	B001
"	0165000045	B002
"	0165000045	B003
"	0165000045	B004
"	0165000045	B005
"	0165000045	B007
"	0165000045	B010
"	0165000045	B011
"	0165000045	P001
"	0165000045	P002
"	0165000045	P003
"	0165000045	P004
"	0165000045	P005
"	0165000045	P007
"	0165000045	P008
"	0165000045	P009
"	0165000045	R001
"	0165000045	R002
"	0165000045	K001
"	0165000045	K002





REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

1980 November 18

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

EPA Region V
RCRA Activities
P. O. Box 7861
Chicago, Illinois 60680

RE: Reynolds Metals Company
RCRA Hazardous Waste
Permit Applications

Gentlemen:

In accordance with the requirements of the 1980 May 19 hazardous waste management regulations, adopted pursuant to the Resource Conservation and Recovery Act (RCRA), please find attached hazardous waste permit applications for the following Reynolds Metals Company facilities located in the Region:^A

McCook Sheet & Plate Plant
Ashtville Building Products Plant

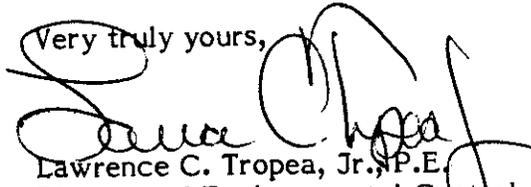
Reynolds believes that many of the provisions of the hazardous waste management regulations are unclear and imprecise and discussions with Agency representatives indicate confusion as to the Agency's interpretation of many provisions of the regulations. The uncertain nature of these regulations is evidenced by the fact that EPA is currently in the process of issuing amendments, interpretations, etc. Reynolds, therefore, reserves the rights to amend these permit applications at any time in the future. Further, Reynolds reserves the rights to file permit applications for other locations or activities, without prejudice or the loss of interim status, should further study and/or future EPA amendments, interpretations, etc. clarify or alter the applicable requirements in a manner which would require such action.

A The submission of these permit applications is not in anyway an admission on the part of Reynolds Metals Company that any of the reported substances are hazardous wastes, as defined under RCRA, or in subsequent promulgations, or that any of the referenced facilities are storers, treaters, or disposers of hazardous wastes or are the owners or operators of hazardous waste management facilities.

EPA Region V
Page -2-
1980 November 18

Reynolds hereby requests that this letter be made an official part of the record on Reynolds' solid waste management activities in the Region. If you have any questions, please feel free to contact Mr. C. R. Bent (804/281-2918) or myself (804/281-3871).

Very truly yours,



Lawrence C. Tropea, Jr., P.E.
Director of Environmental Control
Environmental Control Department

LCT/ja

CC: State of Illinois
State of Ohio

A.4 Closure/
Post-Closure

HAZARDOUS WASTE FACILITY CERTIFICATE
OF
LIABILITY INSURANCE
INSURANCE COMPANY OF NORTH AMERICA

(the "Insurer")
1600 ARCH STREET
PHILADELPHIA, PA 19102

hereby certifies that it has issued liability insurance covering bodily injury and property damage to

(the "insured") Name REYNOLDS METALS COMPANY
ASHVILLE BLDG PRODUCTS PLANT
Mailing Address REYNOLD ROAD
ASHVILLE, OHIO 43103

in connection with the insured's obligation to demonstrate financial responsibility under Rule 3745-55-47 of the Administrative Code. The coverage applies at

<u>E.P.A. I.D. NUMBER</u>	<u>NAME</u>	<u>ADDRESS</u>
1. OHD 055352512	ASHVILLE BLDG PRODUCTS PLANT	REYNOLDS ROAD ASHVILLE OHIO 43103
2.		

for:

- sudden accidental occurrences
 non-sudden accidental occurrences
 sudden and non-sudden accidental occurrences

The limits of liability are \$ 1,000,000 each occurrence
\$ 5,000,000 annual aggregate

exclusive of legal defense costs. The coverage is provided under

Policy Number SCG GO 625405-6

Issued on 12-3-85

The effective date of said policy is 9-30-85

The Insurer further certifies the following with respect to the insurance described on Page 1:

- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under this policy.
- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in paragraph (F) of Rule 3745-55-47 or Paragraph (F) of Rule 3745-66-47 of the Administrative Code.
- (c) Whenever requested by the Director of the Department of Ohio Environmental Protection Agency, the Insurer agrees to furnish to the Director a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Director.
- (e) Any other termination of the insurance will be effective only upon written notice any only after the expiration of thirty (30) days after a copy of such written notice is received by the Director.

I hereby certify that the wording of this instrument is indetical to the wording specified in paragraph (J) of 3745-55-51 of the Administrative Code as such regulations was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states.

Carl D. Brenner

Carl D. Brenner
Account Executive
Authorized Representative of the Insurance Company of North America
1600 Arch Street Philadelphia, PA 19102

OH 055 352 512



REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

October 1, 1982

OH 055 352 512

Mr. Valvas Adamkus
Regional Administrator
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Adamkus:

RE: Resource Conservation and Recovery Act of 1976
Financial Requirements for Closure and
Post Closure Assurance

Enclosed is a Certificate of Insurance from the Travelers Insurance Company certifying issuance of a Closure/Post Closure policy to cover the estimated \$14,000 Closure cost of the waste storage facility at Reynolds Metals Company's Building Products Plant in Ashville, Ohio (EPA ID #GOHD 055352512). We trust this meets with your approval.

Sincerely yours,

REYNOLDS METALS COMPANY

R. Kemper Smith, Jr.

R. Kemper Smith, Jr. *RKS*
Assistant Director
Risk Management Department

RKS/bhm

Enclosure

cc: Charles R. Bent
John L. Doyle

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

THE TRAVELERS

Certificate of Insurance

This is to certify that policies of insurance as described below have been issued to the insured named below and are in force at this time. If such policies are canceled or changed during the periods of coverage as stated herein, in such a manner as to affect this certificate, written notice will be mailed to the party designated below for whom this certificate is issued.

1. Name and address of party to whom this certificate is issued <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> Environmental Protection Agency Waste Management Branch/Region 5 230 South Dear Born Street Chicago, Illinois 60604 Attn: Valvas Adamkus, Regional Administrator </div>	2. Name and address of insured Reynolds Metals Company Risk Management Department Post Office Box 27003 Richmond, Virginia 23261
---	--

3. Location of operations to which this certificate applies
Ashville Building Products Plant, Reynolds Road, Ashville, Ohio 43103

4. Coverages For Which Insurance is Afforded	Limits of Liability	Policy Number	Policy Period**
Workmen's Compensation and Employers' Liability in the state named in item 3 hereof	Compensation—Statutory		
Property Damage Liability—except automobile	\$,000 each occurrence	To Be Determined	9/30/82 Until Cancelled
Closure and Post-Closure XXXXXXXXXXXXXXXXXXXX	\$ 14,000. XXXXXXXXXXXXXXXXXXXX \$,000 XXXXXXXXXXXXXXXXXXXX		
Property Damage Liability—except automobile including Protective	\$,000 each occurrence \$,000 aggregate		
Bodily Injury Liability—automobile	\$,000 each person \$,000 each accident \$,000 each occurrence		
Property Damage Liability—automobile	\$,000 each accident \$,000 each occurrence		
Liability (Bodily Injury and Property Damage)	\$,000 each occurrence \$,000 aggregate		
Catastrophe or Excess	\$,000 each occurrence \$,000 each aggregate \$,000 deductible amt.		

*Absence of an entry in these spaces means that insurance is not afforded with respect to the coverages opposite thereto.
 **Policy is effective and expires at 12:01 A.M., standard time at the address of the named insured as stated herein.

Description of Operations, or Automobiles to which the policy applies:

<u>EPA ID Number</u>	<u>Name</u>	<u>Address</u>
GOHD 055352512	Ashville Building Products Plant	Reynolds Road Ashville, Ohio 43103

The insurance afforded is subject to all of the terms of the policy, including endorsements, applicable thereto.

Producer Johnson & Higgins of Virginia, Inc.
 Office Richmond, Virginia Date 9/30/82

THE TRAVELERS INSURANCE COMPANY
 THE TRAVELERS INDEMNITY COMPANY
 THE CHARTER OAK FIRE INSURANCE COMPANY

By Authorized Representative



REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

July 16, 1982

Mr. Valvas Adamkus
Regional Administrator
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Adamkus:

RE: Resource Conservation and Recovery Act of 1976
Financial Requirements for Closure and
Post Closure Assurance

For your records, we enclose a copy of the Travelers Indemnity Company's letter of intent for a Closure Insurance Policy covering the Reynolds Metals Company's Building Products Plant in Ashville, Ohio ("EPA" ID #GOHD055352512). We trust this meets with your approval.

Sincerely yours,

REYNOLDS METALS COMPANY

R. Kemper Smith, Jr.
R. Kemper Smith, Jr.
Assistant Director
Risk Management Department

RKS/bhm

Enclosure

cc: Charles R. Bent
John L. Doyle



REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

July 16, 1982

Mr. Valvas Adamkus
Regional Administrator
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Adamkus:

RE: Resource Conservation and Recovery Act of 1976
Sudden and Accidental Insurance Certification

Enclosed is a copy of the Hazardous Waste Facility certificate of liability insurance from the Travelers Indemnity Company covering the Reynolds Metals Company's Building Products Plant in Ashville, Ohio ("EPA" ID #GOHD 055352512). The original of this certificate was forwarded by the Travelers on July 1, to Mr. Thomas Golz in your Waste Management Branch in Chicago as specified in the April 7 Federal Register. We hope this meets with your approval.

Sincerely yours,

REYNOLDS METALS COMPANY

R. Kemper Smith, Jr.

R. Kemper Smith, Jr.
Assistant Director
Risk Management Department

RKS/bhm

Enclosure

cc: Charles R. Bent
John L. Doyle

Atlanta
Boston
Charlotte
Chicago
Cleveland
Dallas
Denver
Detroit
Houston
Los Angeles
Miami
Minneapolis
New Orleans
Philadelphia
Phoenix
Pittsburgh
Portland
Richmond
St. Louis
San Diego
San Francisco
Seattle
Wilmington
Tokyo
Singapore
Taipei
Hong Kong

JOHNSON & HIGGINS

OF VIRGINIA, INC.

Business Established New York 1845

INSURANCE

ACTUARIES-EMPLOYEE BENEFIT PLAN CONSULTANTS

July 12, 1982

Calgary
Edmonton
Montreal
Quebec
Toronto
Vancouver
Winnipeg
Caracas
Maracaibo
Puerto La Cruz
Rio de Janeiro
Sao Paulo
Buenos Aires
Santiago
Lima
Bogota
Cali
Sydney
Melbourne
Brisbane
Adelaide
Perth
Auckland
Wellington
London
Milan
Paris
Rome
Bermuda
Tehran

CABLE ADDRESS "KERODEN"
TELEX NO. 62222

18TH FLOOR, THE EIGHTH AND MAIN BUILDING
707 EAST MAIN STREET
P.O. BOX 1137, RICHMOND, VIRGINIA 23208
TEL. 804/788-8801

Mr. R. Kemper Smith, Jr.
Assistant Director - Risk Management
Risk Management Department
Reynolds Metals Company
Post Office Box 27003
Richmond, Virginia 23261

Re: Reynolds Metals Company
Financial Requirements For Closure
and Post Closure Assurance
Under Resource Conservation and
Recovery Act of 1976 (RCRA)

Dear Kemper:

Following our July 9 letter, enclosed is copy of Travelers' July 6 letter directed to EPA Regional Administrator Valvas Adamkus, Chicago, Illinois. It advises that TIC is considering the issuance of a Closure Insurance Policy to cover our \$49,100. Closure Costs at RMC's Ashville Building Products Plant. The letter was sent Registered Mail Return Receipt Requested. Upon receiving a copy of the Registered Receipt, it will be forwarded to complete your file.

Should you have any questions concerning this matter, please let us know.

Thank you.

Very truly yours,


James P. O'Shea

/dm

Enclosure

cc: Mr. L. E. Graziano
Mr. T. J. Lyon



THE TRAVELERS

July 6, 1982

Mr. Valvas Adamkus
Regional Administrator
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Adamkus:

Reynolds Metals Company

This is to advise, that the Travelers Insurance Company is considering the issuance of a Closure Insurance Policy to Reynolds Metals Company, conforming to the specifications of the EPA Regulations as set forth in the April 7, 1982 Federal Register for closure costs of \$49,100 at the following location:

Ashville Bldg. Products Plant
Reynolds Rd.
Ashville, OH 43103
EPA ID # GOHD 055352512

If you need any additional information, please don't hesitate to contact us.

Sincerely,

Olga Radke
Underwriting Analyst
C/P Special Accounts Marketing
Atlantic Market

OR:nao

HAZARDOUS WASTE FACILITY CERTIFICATE
of
LIABILITY INSURANCE

- | | |
|---|--|
| <input checked="" type="checkbox"/> Travelers Indemnity Company | <input type="checkbox"/> Travelers Indemnity Company of Rhode Island |
| <input type="checkbox"/> Travelers Indemnity Company of America | <input type="checkbox"/> Travelers Indemnity Company of Illinois |
| <input type="checkbox"/> The Phoenix Insurance Company | <input type="checkbox"/> Charter Oak Fire Insurance Company |

One Tower Square
Hartford, Connecticut 06115

hereby certifies that it has issued liability insurance covering bodily injury and property damage to

Name REYNOLDS METALS COMPANY

Mailing Address ASHVILLE BLDG PRODUCTS PLANT
REYNOLDS RD
ASHVILLE OHIO 43103

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at

<u>E.P.A. I.D. NUMBER</u>	<u>NAME</u>	<u>ADDRESS</u>
1. GOND 055352512	ASHVILLE BLDG PRODUCTS PLANT	REYNOLDS RD ASHVILLE OHIO 43103
2.		

for:

- sudden accidental occurrences
- non-sudden accidental occurrences
- sudden and non-sudden accidental occurrences

The limits of liability are \$ 1,000,000 each occurrence
\$ 2,000,000 annual aggregate

exclusive of legal defense costs. The coverage is provided under

Policy Number TEE-SLG-167T131-6-81

Issued on 10-30-81

The effective date of said policy is 09-30-81

(CONTINUED ON REVERSE)

RICH-179
06-30-82

CP - 2852

James P. O'Shea
Resident Agent
JOHNSON & HIGGINS OF VIRGINIA, INC.

The Insurer further certifies the following with respect to the insurance described on Page 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

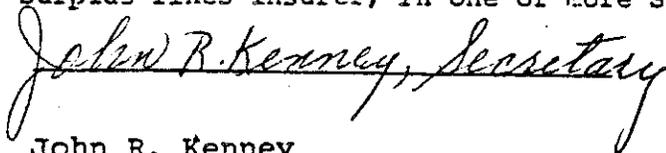
(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after ~~a copy of such~~ written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.



John R. Kenney
Secretary, Authorized Representative of The Travelers Insurance
Companies
One Tower Square, Hartford, Connecticut 06115

This endorsement modifies such insurance as is afforded by the provisions of the policy relating to the following:

**COMPREHENSIVE GENERAL LIABILITY INSURANCE
MANUFACTURERS AND CONTRACTORS LIABILITY INSURANCE
OWNERS, LANDLORDS AND TENANTS LIABILITY INSURANCE
SMP LIABILITY INSURANCE
ENVIRONMENTAL HAZARD LIABILITY POLICY**

HAZARDOUS WASTE FACILITIES -- AMENDATORY PROVISIONS

It is agreed that the following additional provisions apply with respect to a Hazardous Waste Treatment, Storage, or Disposal Facility subject to the financial responsibility requirements of Title 40 CFR Part 264.147 or 265.147 (Environmental Protection Agency Regulations); provided that the Travelers has filed a Hazardous Waste Facility Certificate that includes that facility:

1. The company shall pay any applicable deductible amount and, upon notification of such payment, the named insured shall promptly reimburse the company for the amount so paid. This provision does not apply with respect to that amount of any deductible for which financial responsibility is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).
2. Neither the company nor the insured may terminate the insurance provided herein for any facility except by providing written notice to the other party and the Regional Administrator(s) of the EPA Region(s) in which such facility(ies) is (are) located. Termination by cancellation shall be effective no fewer than sixty (60) days after such written notice is received by the Regional Administrator; other termination shall be effective no fewer than thirty (30) days after receipt of such notice.

James P. O'Shea
Resident Agent
JOHNSON & HIGGINS OF VIRGINIA, INC.

NOTICE OF CANCELLATION

**Hazardous Waste Liability Certificate
of
Liability Insurance**

filed with

Name ENVIRONMENTAL PROTECTION AGENCY
Address WASTE MANAGEMENT BRANCH
230 SOUTH DEARBORN STREET
CHICAGO IL 60604
ATTN: MR. THOMAS GOLZ

RECEIVED
OCT 1 1985
U.S. EPA, REGION 4
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

This is to advise that policy # TEE-SLG-167T131-6-81
(Named Insured) REYNOLDS METALS COMPANY
(Mailing Address) ASHVILLE BLDG PRODUCTS PLANT
REYNOLDS RD
ASHVILLE OH 43103
(Facility Name) ASHVILLE BLDG PRODUCTS PLANT
(Facility Address) REYNOLDS RD
ASHVILLE OH 43103
EPA I.D.# OHD 055352512

by TRAVELERS INDEMNITY COMPANY
(Name of Company)
One Tower Square
Hartford, Connecticut 06115

said policy no longer covers the Liability Insurance requirements for a Hazardous Waste Facility Certificate effective as of the 4TH day of DECEMBER, 19 85 12:01 a.m. standard time at the address of the named insured as stated in said policy, provided said date is not less than SIXTY (60) days after the receipt of this notice by the Regional Administrator.

RICH-179
09-25-85

John R. Kenney - Secretary (om)
John R. Kenney
Secretary, Authorized
Representative of The Travelers
Insurance Companies
One Tower Square
Hartford, Connecticut 06115

**C.2 Compliance/
Enforcement**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: December 28, 1994
SUBJECT: TC Evaluation of Reynolds Metals Company
OHD 055 352 512
FROM: Enforcement Programs Section
TO: The File

RECEIVED
WMD RECORD CENTER

JAN 06 1995

The Ohio Environmental Protection Agency (OEPA) conducted a Compliance Evaluation inspection of Reynolds Metals Company on July 18, 1991. The inspection identified violations and an NOV was issued 8-14-91. TCLP testing was done and included in the report. This report was transmitted for our information.
Attachment



State of Ohio Environmental Protection Agency

Central District Office

RECEIVED
WMD RECORD CENTER

JUN 21 1994

7/5
TJ.P
TCLP

Street Address:
2305 Westbrooke Drive, Building C
Columbus, Ohio 43228
614-771-7505 FAX 614-771-7571

Mailing Address:
P.O. Box 2198
Columbus, Ohio 43266-2198

George V. Volinovich
Governor

August 14, 1991

RE: Reynolds Metals Company
OHD055352512
Pickaway County
-LQG-

Mr. Bob Johnson, Plant Engineer
Reynolds Metals Company
Reynolds Rd.
Ashville, OH 43103

RECEIVED

OCT 07 1991

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Dear Mr. Johnson:

On July 18, 1991 I inspected Reynolds Metals Company for compliance with Ohio and Federal regulations pertaining to the generation of more than 1000 kg of hazardous waste per calendar month. The following violations were found:

1. REGULATION: Ohio Administrative Code (OAC) 3745-65-16 states that the job title for each position related to hazardous waste management, the name of the employee filling each job, and a written job description for these positions must be maintained at the facility. The job descriptions shall include requisite skill or education and the duties of hazardous waste management position.

VIOLATION: Reynolds violated OAC 3745-65-16 by not maintaining the above mentioned job titles and descriptions.

2. REGULATION: OAC 3745-65-52(E) states that the contingency plan shall include a list of all emergency equipment including fire extinguishers, spill control equipment, communications, and alarm systems.

VIOLATION: Reynolds violated OAC 3745-65-52(E) by not including their spill control adsorbent in the list of emergency equipment.

3. REGULATION: OAC 3745-65-33 states that all emergency equipment shall be tested on a weekly basis.

VIOLATION: Reynolds violated OAC 3745-65-33 by inspecting their fire extinguishers on a monthly basis only.

4. REGULATION: OAC 3745-66-73(A) states that containers of hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.



Mr. Bob Johnson, Plant Engineer
Reynolds Metals Company
Page 2
August 14, 1991

VIOLATION: Reynolds violated OAC 3745-66-73(A) by having open containers of hazardous waste. The drum of solvent/paint waste next to the window shutter painting booth was open. There was also a one gallon open bucket of this waste. In addition, the drum of water based paint cleanup hazardous waste in the coating room was open.

5. REGULATION: OAC 3745-66-71 states that if a container holding hazardous waste is not in good condition, or if it begins to leak, the hazardous waste must be transferred to a good condition container, or manage the waste in another manner that complies with the requirements of the hazardous waste rules.

VIOLATION: Reynolds violated 3745-66-71 by storing a dented drum of hazardous waste that had leaked and been patched.

6. REGULATION: Title 40 of the Code of Federal Regulations (40 CFR), Part 268.9(a) states that the initial generator of a solid waste must determine each EPA hazardous waste number applicable to the waste in order to determine the applicable land disposal treatment standards.

VIOLATION: Reynolds violated 40 CFR, Part 268.9(a) by not assigning the D006 (for cadmium) waste code to the solids of the D001, F005, D035 waste generated from use of solvent based paints. Your TCLP analysis of this waste showed it to be above the hazardous waste characteristic level for cadmium. The lack of assigning the D006 code to this waste has caused the waste to be shipped without an accompanying notification that states that the waste exceeds the land disposal restriction treatment standard for cadmium.

7. REGULATION: 40 CFR, Part 268.7(a)(1) and OAC 3745-59-07(A)(1) states that if a generator determines that he is managing a waste that does not meet its land disposal restriction treatment standard then with each shipment of the waste the generator must notify the treatment or storage facility of the treatment standards. This notice must include the following:

1. EPA hazardous waste number
2. The treatment standards which the waste exceeds.

Mr. Bob Johnson, Plant Engineer
Reynolds Metals Company
Page 3
August 14, 1991

RECEIVED
OHIO EPA

AUG 15 1991

3. The manifest number of the shipment
4. Waste analysis data, where available

DIV. of SOLID & HAZ. WASTE MGT.
VIOLATION: Reynolds violated 40 CFR 268.7(a)(1) and OAC 3745-59-07(A)(6) by not designating on its land disposal restriction notice that the shipment of hazardous waste sent on June 17, 1991 with manifest # 571 exceeded the treatment standard for methyl ethyl ketone.

8. REGULATION: 40 CFR 268.7(a)(7) states that generators must retain on-site a copy of all land disposal restriction notices for at least five years from the date of shipment.

VIOLATION: Reynolds violated 40 CFR 268.7(a)(7) by not retaining a copies of the land disposal restriction notifications for the shipments of March 1, 1991 (manifest # 567) and May 6, 1991 (manifest # 569).

These violations must be corrected. Your fax submittal of July 25 and 26, 1991 demonstrates your return to compliance with the rules cited in violations numbered 1 through 4 and 8 of this letter. Respond to me in writing within 30 days of the date of this letter with documentation sufficient to show your compliance with the remaining rules cited.

Reynolds Metals Company has also been evaluated for compliance with 40 CFR 261.24 (TCLP) which became effective for large quantity generators on September 25, 1990. The U.S. EPA, Region V will provide appropriate follow-up on this matter.

Sincerely,

Robert Almquist

Robert Almquist
Division of Solid and Hazardous Waste Management
Central District Office

RA/sc

Enclosure

cc: Carolyn Reiersen, ES, DSHWM, CO

**RCRA HAZARDOUS WASTE GENERATOR
COMPLIANCE EVALUATION INSPECTION CHECKLIST**

Facility: Reynolds Metals Company
 USEPA I.D.: OH0055352512 HWFB No.: _____
 Street: Reynolds Road
 City: Ashville State: OH zip: 43103
 County: Pickaway Telephone: 614-983-2571
 Owner/Operator: Same
 Street: 6601 West Broad
 City: Richman State: VI zip: 23230
 Telephone: 804-281-2000

Inspection Date: 7 / 11 + 18 / 91 Time: _____

Advance notice of inspection given? (yes) (no) _____
 If so, how far in advance? 1 1/2 weeks

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>Robert Almqvist</u>	<u>Ohio EPA/RCRA inspector</u>	<u>614-771-7505</u>
	<u>(7/11/91 only) Kim Jenkins</u>	<u>PRC Environmental/U.S. EPA contractor</u>	<u>513-241-0149</u>
Facility Representative:	<u>(7/11/91 only) Peter Zelinskas</u>	<u>PRC Environmental</u>	<u>same</u>
	<u>Robert Johnson</u>	<u>Reynolds Metals/Plant Engineer</u>	<u>614-983-2571</u> <u>ex. 365</u>

STATUS

Cond. Exempt SQG _____ SQG _____ Large Quantity Generator
 LDR Checklist Attached: (yes) (no) _____

ACTIVITIES

Containers <input checked="" type="checkbox"/>	Used oil burner _____
Tanks _____	Hazardous waste fuel burner/blender _____
Wastepile _____	Incineration/Thermal treatment _____
Landfill _____	Land treatment _____
Surface Impoundment _____	Groundwater monitoring _____

GENERAL INFORMATION

This Reynolds Metals facility starts with coils of aluminum sheeting and paints and forms all parts of building aluminum siding. They also form and paint polypropylene window shutters.

This facility generates hazardous waste from changing paint and from other cleaning out of the roll painting trays used to paint the rolls aluminum. Both solvent based and water based paints are used in this roll painting. A D001 waste is generated from the clean-up of the water based paints used. A D001, F005, D035 waste is generated from using methyl ethyl ketone to clean-up from the solvent based paints. The liquid portion of these wastes are pumped out of the drums into a tanker truck and taken by Ross Incineration Services (OHD048415665), Grafton, OH. The settled solids of this waste along with the filters used to filter the paint and any rags are consolidated into drums which are also taken by Ross Incineration Services.

Prior to painting the rolls of aluminum, they are cleaned with a NaOH solution and conversion coated with a chromium solution. The conversion coating is done in an enclosed system and waste is not normally generated from it. In the past, about 4 years ago, the chromium solution was sprayed on which generated a waste that went to this facility's wastewater treatment unit. Reynolds has two in-ground, concrete, and plastic lined tanks for the accumulation before treatment of the presently generated NaOH waste and the previously generated chromium waste. At the time of the inspection the chromium tank had been drained and its contents were stored in 19 water trailers. A new liner is planned to be installed over the old liner due to tears in the old liner. The chromium waste will then be again be stored in the tank and treated in the wastewater treatment unit. One 20 yard roll-off box of F019 waste sludge is generated about every 6 weeks from the wastewater treatment unit. This waste is taken by Chemical Waste Management (IND078911146), Fort Wayne, IN.

A D001, F005, D035 waste is generated from using methyl ethyl ketone to clean-up from painting the polypropylene shutters. The air filters from this painting booth and also the overspray paint dust is taken by Ross Incineration Services as a D040 hazardous waste.

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

(yes) _____ (no)

If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

(yes) _____ (no)

If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

OR;

- b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

(yes) (no) _____

If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

3 1991

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A)(B) and (C)?

yes _____

If not, specify those waste streams which the generator has failed to adequately evaluate:

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04?

no _____

If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06?

no _____

If so, please identify these waste streams below:

4. Is the generator recycling any materials on-site by:
- a. Using or reusing the material as an ingredient in an industrial process to make a product?
 - 1. If so, is the material being reclaimed before it is used or reused? no
 - b. Using the material as a substitute for commercial products? NA
 - c. Returning the material to the original process from which it was generated as a substitute for a raw material feedstock?
 - 1. If so, is the material reclaimed before returning to the original process? no

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below:

5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01? yes

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:

wastewater treatment unit

6. Are Land Disposal Restricted (LDR) wastes being generated? yes
 If so, complete the Land Disposal Restriction Checklist.

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

7. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from USEPA as required by 3745-52-12? yes

GENERATOR ANNUAL REPORT (OAC 3745-52-41)

8. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41? yes

HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57
AND OAC 3745-52-60)

Y/N/NA RMK #

9. Does the generator import or export hazardous waste?

no _____

If so, are the wastes handled in accordance with the requirements of 3745-52-50 through 3745-52-57 and 3745-52-60?

NA _____

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)

Y/N/NA RMK #

10. Does the generator meet the following pre-transport requirements prior to offering hazardous wastes for transport off-site:

a. The waste material is packaged, labeled, and marked in accordance with the applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32]?

yes _____

b. Each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32?

yes _____

c. The generator meets the requirements for proper DOT placarding or offers the appropriate DOT placards to the initial transporter in compliance with 3745-52-33?

yes _____

REMARKS - PRETRANSPORT REQUIREMENTS

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

Y/N/NA RMK #

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 in compliance with 3745-52-20(A)? yes _____
 - b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22? yes _____
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E)? yes _____
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A)(1)(2)? yes _____
2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter?
 - a. If not, has the generator complied with the Manifest Exception reporting requirements in 3745-52-42? NA _____
3. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40? yes _____

REMARKS - MANIFEST REQUIREMENTS

GENERATOR CLOSURE REQUIREMENTS (3745-52-34)

Y/N/NA RMK #

1. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection?

no _____

If so, describe the unit(s) which the generator has closed:

2. If the generator has closed any < 90-day accumulation unit(s) as described in Question #1, was closure completed to meet the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]

NA _____

Please provide a description of the type of documentation provided by the generator to confirm that closure was completed in accordance with the closure performance standard:

REMARKS - GENERATOR CLOSURE REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)

Y/N/NA RMK #

1. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A)(4)] yes _____
2. Does the generator provide Personnel Training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A)(4)] yes _____
3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A)(4)] yes _____
4. Does the generator keep all the records required by 3745-65-16(D)(E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] no 1

REMARKS - PERSONNEL TRAINING REQUIREMENTS

1. Written job titles and descriptions for hazardous waste management positions were not found at the facility.

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)

Y/N/NA RMK #

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components: [3745-65-52(A)(B)(C)(D)(E)]
 - a. Actions to be taken by personnel in the event of an emergency? yes _____
 - b. Arrangements or agreements with local or state emergency authorities? yes _____
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? yes _____
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? no 1 _____
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)]? yes _____
2. Is the Contingency Plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51(A)] yes _____
3. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has the plan been submitted to all local and state emergency authorities that might be required to participate in execution of the plan? [3745-65-53(A)(B)] yes _____
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] yes _____
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-55] yes _____

1. Spill control equipment, such as "floor dry", was not on this list.

Y/N/NA RMK #

6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications necessary under 3745-65-56(A-J)?

NA _____

REMARKS - CONTINGENCY PLAN REQUIREMENTS

Y/N/NA RMC #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented?
[OAC 3745-65-37(B)]

NA _____

REMARKS - PREPAREDNESS AND PREVENTION REQUIREMENTS

1. Fire extinguishers are inspected only monthly.

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] yes _____
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection? no _____
 - a. If yes, was the contingency plan implemented? [3745-65-51(B)] NA _____
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)]
 - a. Internal alarm system? yes _____
 - b. Access to telephone, radio or other device for summoning emergency assistance? yes _____
 - c. Portable fire control equipment, spill control and decontamination equipment? yes _____
 - d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers? yes _____
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33] no 1
 - a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs? yes _____
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] yes _____
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35] yes _____
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)] yes _____

GENERATOR ACCUMULATION IN CONTAINERS AND TANKS
(OAC 3745-52-34)

Y/N/NA RMK #

1. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a permit as provided under 3745-52-34, are the following requirements met:

- a. The containers or tanks are clearly marked with the words "Hazardous Waste"? [OAC 3745-52-34(A)(3)]
- b. The date that accumulation began is clearly marked on each container? [OAC 3745-52-34(A)(2)]

yes _____
yes _____

In addition, OAC 3745-52-34(A)(1) also requires generators accumulating hazardous waste(s) in containers < 90 days to comply with the "Container Management" Rules of OAC 3745-66-70 to 3745-66-77. If the generator is accumulating hazardous waste(s) in containers, please complete Management of Containers checklist to document compliance with these requirements.

2. Is the generator accumulating hazardous waste(s) in tanks? no _____

If so, OAC 3745-52-34(A)(1) requires generators to comply with Rules 3745-66-90 to 3745-66-992 except Paragraph (c) of rule 3745-66-97 and rule 3745-66-991.

If the generator is accumulating hazardous waste(s) in tanks, complete the Storage and Treatment in Tanks checklist to document compliance with these requirements.

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days? yes _____

- a. If so, has the generator been granted an extension by the Director for accumulation in excess of (90) days? yes 1 _____

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

1. Extension was granted by letter dated February 4, 1987.

SATELLITE ACCUMULATION AREA REQUIREMENTS
(OAC 3745-52-34(C))

Y/N/NA RMK #

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation)

yes _____

If so, are the following requirements of OAC 3745-52-34(C) being met:

- a. Quantities of waste accumulated do not exceed 55 gallons at any time?
- b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?
- c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container?

yes _____

NA _____

yes _____

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34(C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b?

no _____

- a. If so, did the generator comply with 3745-52-34(A) within three (3) days? and;

NA _____

- b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating?

NA _____

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77)

Y/N/NA RMK #

- | | | | |
|----|--|------------|-------------|
| 1. | Are hazardous wastes stored in containers which are: | | |
| | a. Closed? [3745-66-73(A)] | <u>no</u> | <u>1</u> |
| | b. In good condition? [3745-66-71] | <u>no</u> | <u>2</u> |
| | c. Compatible with wastes stored in them? [3745-66-72] | <u>yes</u> | <u> </u> |
| 2. | Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] | <u>no</u> | <u>1</u> |
| 3. | Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] | <u>no</u> | <u>2</u> |
| 4. | Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] | <u>yes</u> | <u> </u> |
| 5. | Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information: | | |
| | a. Date and time of inspections? | <u>yes</u> | <u> </u> |
| | b. Name of inspector? | <u>yes</u> | <u> </u> |
| | c. Notation of observations made during the inspection? | <u>yes</u> | <u> </u> |
| | d. The date and nature of any repairs or other remedial action? | <u>yes</u> | <u> </u> |
| 6. | Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so, | <u>yes</u> | <u> </u> |
| | a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] | <u>yes</u> | <u> </u> |
| | b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] | <u>yes</u> | <u> </u> |

REMARKS - CONTAINER MANAGEMENT REQUIREMENTS

1. The inside, satellite accumulation area drum of ^{shutten} waste solvent/paint was open. There was also a 1gallon open bucket of this waste. The satellite accumulation area drum of water based paint clean-up waste in the coating room was also open.
2. One damaged and patched waste drum was stored outside. Damage to this drum probably occurred in transport to the outside storage area.

16 21 - -

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

1. General Information

Facility: Reynolds Metals Company
 U.S. EPA ID No.: OH0055352512
 Street: Reynolds Rd
 City: Ashville State: OH Zip: 43103
 Telephone: 614-983-2571

Inspection Date: 7/11/91 Time: (am/pm)
 Weather Conditions:

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>Robert Almquist</u>	<u>Ohio EPA/RCRA inspector</u>	<u>614-771-7505</u>
(7/11/91 only)	<u>Kim Jenkins</u>	<u>PRC Environmental/U.S. EPA contractor</u>	<u>513-241-0149</u>
Facility Representatives:	<u>Robert Johnson</u>	<u>Reynolds Metals/</u>	<u>614-983-2571</u>
		<u>Plant Engineer</u>	

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
F020-F023 and F026-F028	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
California List*	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
First Third [40 CFR 268.10]	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Second Third [40 CFR 268.11]	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Third Third [40 CFR 268.12]	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

* See Appendix A

INSPECTION SUMMARY

This Reynolds Metals facility starts with coils of aluminum sheeting and paints and forms all parts of building aluminum siding. They also form and paint polypropylene window shutters.

A D001 waste is generated from the clean-up of the water based paints used. A D001, F005, D035 waste is generated from using methyl ethyl ketone to clean-up from solvent based paints. The liquid portion of these wastes are pumped out of the drums into a tanker truck for disposal. The settled solids of this waste along with the filters used to filter the paint and any rags are consolidated into drums which are taken as is for disposal. A F019 wastewater treatment sludge is generated from treating wastewater from the chemical conversion coating of aluminum.

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:

0 F005

2. F020-F023 and F026-F028 dioxin-containing wastes:

3. California List Wastes (See Appendix A):

4. First Third Wastes [40 CFR 268.10]:

5. Second Third Wastes [40 CFR 268.11]:

6. Third Third Wastes [40 CFR 268.12]**:

P001 and F019

*See Appendix B.

** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic (55 FR 22531).

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

Yes No

If no, list below:

Assigned Classification

Correct Classification

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(c)]

Yes No List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes No List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes No List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes No List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes No List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes No List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes No NA

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
F005	<input type="checkbox"/>	<input checked="" type="checkbox"/>
_____	<input type="checkbox"/>	<input type="checkbox"/>
_____	<input type="checkbox"/>	<input type="checkbox"/>

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents (listed in 40 CFR 268.41, Table CCME. [40 CFR 268.2(f)(1)])

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes No NA

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
_____	<input type="checkbox"/>	<input type="checkbox"/>
_____	<input type="checkbox"/>	<input type="checkbox"/>
_____	<input type="checkbox"/>	<input type="checkbox"/>

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes No NA

If available, list each waste code and check the correct treatability group:

<u>Waste Code</u>	<u>Subcategory</u>	<u>Wastewater*</u>	<u>Nonwastewater</u>
<u>K001</u>	<u>high TOC</u>	<u> </u>	<u> ✓ </u>
<u>F019</u>	<u> </u>	<u> </u>	<u> ✓ </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments _____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes No NA

c. Does the generator specify alternative treatment standards for lab packs?*

Yes No NA

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

- Organometallics: 40 Part 268, Appendix IV constituents
- Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes No NA

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

a. Liquid hazardous wastes containing PCBs \geq 50 ppm

Yes No NA

If yes, check the appropriate treatability group:

- 50 to 500 ppm PCBs
- \geq 500 ppm PCBs

b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ___ NA

If yes, check the appropriate treatability group:

- Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
- All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes ___ No ___ NA

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
_____	_____	____/____/____
_____	_____	____/____/____
_____	_____	____/____/____

Comments _____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No NA ___

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Comments _____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes No ___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

Doc 1 MSDS Attached

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP? (BDAT*** = stabilization/immobilization technology)

Yes No ___ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I, EPA Test Method 1311)

**See Appendix C for exceptions.

***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

Dec 1, 1985

FCCS

Dec 17, 1990

FOI9 - Dec 6, 1989

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis? (BDAT = destruction/removal technology)

Yes No NA

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

FOI9 (cyanide) - Dec 6, 1989

d. PFLT*: Was PFLT used to determine if California List constituents were contained in liquid hazardous waste?

Yes No NA

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. SW-846)

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes No (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes No

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)

Yes No (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

- Based on a detailed chemical and physical analysis of a representative sample
- Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No (If No, go to c.)

Check appropriate category:

- Dilutes to meet treatment standards
- Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- Managed in treatment systems regulated under the Clean Water Act
- Non-toxic* characteristic wastes
- Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 2262]

Yes ___ No ___ NA

C. Management

1. On-Site Management

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ___ No

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments _____

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met? [40 CFR 268.9(d)]

Yes ___ No ___ NA

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards/prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
0001	Ross Incineration Services
D001, D025, F005	Ross Incineration Services
F019 (cr)	Chemical Waste Management

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ___ No see letter violation #7 (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes No ___ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
FC9 (cyanide)	Chemical Waste Management
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes No ___ (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes No

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes No (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes No

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes No NA (If No or NA, go to 4.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes No

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes No (If No, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(7)]

Yes ___ No see letter violation #8

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ___ No ___ NA

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes No ___ NA ___

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

MATERIAL SAFETY DATA SHEET
COATINGS AND RESINS GROUP

SECTION I - PRODUCT INFORMATION

MANUFACTURER'S NAME: PPG INDUSTRIES, INC.
PRODUCT CODE/IDENTITY: 1LW41192 (051590D)
CUSTOMER PART#/NAME:
PRODUCT TRADE NAME: ENVIRON IMPERIAL WHITE
CHEMICAL FAMILY: ACRYLIC LATEX

SHIPPING INFORMATION

US-DOT: SHIPPING NAME/HAZARD CLASS: PAINT, COMBUSTIBLE LIQUID
UN NUMBER: UN1263

PPG SAFETY AND HEALTH INDEX IN-PLANT HAZARD RATINGS

HEALTH= 2
FLAMMABILITY= 2
REACTIVITY= 0

0=MINIMAL 1=SLIGHT 2=MODERATE 3=SERIOUS 4=SEVERE

*=CONTAINS INGREDIENT(S) WHICH MAY CAUSE CHRONIC (LONG-TERM) HEALTH EFFECTS

EMERGENCY MEDICAL/SPILL INFO: (304) 843-1300

TECHNICAL INFO: AUTO REFINISH: (800) 245-2590, IN OHIO (216) 671-0050
PITTSBURGH PAINTS: (800) 441-9695

PRODUCT SAFETY INFO: 260 KAPPA DRIVE
PITTSBURGH, PA 15238
(412) 492-5555

DATE OF MSDS PREPARATION: 6/21/90

THIS MATERIAL SAFETY DATA SHEET HAS BEEN PREPARED IN ACCORDANCE WITH THE OSHA HAZARD COMMUNICATION STANDARD (29 CFR 1910.1200), THE SUPPLIER NOTIFICATION REQUIREMENTS OF SARA TITLE III, SECTION 313, AND OTHER APPLICABLE RIGHT-TO-KNOW REGULATIONS. ABBREVIATIONS AND OTHER DESIGNATIONS USED ON THIS MATERIAL SAFETY DATA SHEETS INCLUDE THE FOLLOWING:

U/I = UNKNOWN INFORMATION; N/A = NOT APPLICABLE;
NOT ESTAB. = NOT ESTABLISHED; CERT. LTR. = CHEMICAL
O.K. ON TSCA INVENTORY; CAS NO. NOT AVAILABLE

0752252442 (CUSTOMER NO.) LOCATION : 0808 901LW41192///621

CONTINUATIC.

SECTION II - INGREDIENTS AND REGULATORY INFORMATION:

INGREDIENTS	CAS NUMBER	% WEIGHT	...SARA TITLE III & CERCLA CLASSIFICATIONS....					
			HS (102)	EHS (302)	TC+ (313)	RQ (LBS)	TPO (LBS)	SARA 311/312 AC CH FL PR RE
MODIFIED MELAMINE-FORMALDEHYDE RESIN	9003-08-1	2- 5	N	N	N	N/A	N/A	Y N Y N N
CALCIUM CARBONATE	1317-65-3	1- 2	N	N	N	N/A	N/A	Y N N N N
TITANIUM DIOXIDE #	13463-67-7	25-30	N	N	N	N/A	N/A	N Y N N N
ORGANIC WHITE PIGMENT	9011-05-6	2- 5	N	N	N	N/A	N/A	N N N N N
DEIONIZED WATER	7732-18-5	25-30	N	N	N	N/A	N/A	N N N N N
DIETHYLENE GLYCOL MONOBUTYL ETHER	112-34-5	2- 5	N	N	Y	N/A	N/A	Y Y N N N
ETHYLENE GLYCOL	107-21-1	5-10	N	N	Y	N/A	N/A	Y Y N N N
FILM FORMERS, RESINS, AND ADDITIVES	NOT ESTAB.	25-30	N	N	N	N/A	N/A	Y N N N N

*** THE FOLLOWING INGREDIENTS ARE REPORTABLE AS SARA SECTION 313 CHEMICAL CATEGORIES ***
 GLYCOL ETHERS NOT ESTAB. 2- 5

*** OCCUPATIONAL EXPOSURE LIMITS HAVE BEEN ESTABLISHED FOR THE FOLLOWING MATERIALS ***

INGREDIENTSACGIH.....	OSHA.....	PPG-IPEL.....	
	TLV-TWA	TLV-STEL	PEL-TWA	PEL-STEL	IPEL-TWA	IPEL-STEL
CALCIUM CARBONATE	10 mg/m3	NOT ESTAB	15 mg/m3	NOT ESTAB	10 mg/m3	NOT ESTAB
TITANIUM DIOXIDE #	10 mg/m3	NOT ESTAB	15 mg/m3	NOT ESTAB	10 mg/m3	NOT ESTAB

*** SARA 311/312 CATEGORIES FOR THIS PRODUCT ***
 ACUTE=Y CHRONIC=Y FLAM=Y PRESS=N REAC=N

*** PRODUCT STATUS RELATIVE TO THE US EPA TOXIC SUBSTANCES CONTROL ACT ***
 ALL CHEMICAL SUBSTANCES IN THIS PRODUCT COMPLY WITH ALL APPLICABLE RULES OR ORDERS UNDER THE ENVIRONMENTAL PROTECTION AGENCY'S TOXIC SUBSTANCES CONTROL ACT.

*** FOOTNOTES FOR SECTION II ***

CARCINOGENIC ACCORDING TO CRITERIA ESTABLISHED BY: * = NTP ** = IARC @ = OSHA # = OTHER
 ORAL = LD50 ORAL (RAT), (g/kg) DERM = LD50 DERMAL (RABBIT), (g/kg) INHL = LC50 INHALATION (RAT), (Mg/L)
 + INGREDIENTS IN THE TC COLUMN ARE SUBJECT TO THE REPORTING REQUIREMENTS OF SARA TITLE III. SEE 40 CFR PART 372.

CONTINUED ON PAGE 3

SECTION III - PHYSICAL/CHEMICAL CHARACTERISTICS

(FORMULA VALUES, NOT SALES SPECIFICATIONS)

BOILING RANGE: 82 - 230 DEG. C	SOLUBILITY IN WATER: 39.5%
VAPOR PRESSURE: 16.0mmHg	WT/GAL (LBS): 11.37 (U.S.)
VAPOR DENSITY: HEAVIER THAN AIR	pH: U/I
% VOL/VOLUME: 51.50	% SOLID BY WEIGHT: 61.93
EVAP RATE(SUCAC=100): 29	SPECIFIC GRAVITY: 1.36

ODOR/APPEARANCE: VISCOUS LIQUID WITH AN ODOR CHARACTERISTIC OF THE CHEMICAL FAMILY AND ANY SOLVENTS LISTED IN SECTION II.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

US-DOT CATEGORY: COMBUSTIBLE
 FLASHPOINT: 130 DEG. F PMCC
 EXTINGUISHING MEDIA: USE NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) CLASS B EXTINGUISHERS (CARBON DIOXIDE, DRY CHEMICAL, OR UNIVERSAL AQUEOUS FILM FORMING FOAM) DESIGNED TO EXTINGUISH NFPA CLASS II COMBUSTIBLE LIQUID FIRES.

FLAMMABLE LIMITS: LEL U/I UEL U/I

UNUSUAL FIRE AND EXPLOSION HAZARDS:

CLOSED CONTAINERS MAY EXPLODE OR BURST (DUE TO THE BUILD-UP OF STEAM PRESSURE) WHEN EXPOSED TO EXTREME HEAT.

SPECIAL FIRE FIGHTING PROCEDURES:

WATER SPRAY MAY BE INEFFECTIVE. WATER SPRAY MAY BE USED TO COOL CLOSED CONTAINERS TO PREVENT PRESSURE BUILD-UP AND POSSIBLE AUTOIGNITION OR EXPLOSION WHEN EXPOSED TO EXTREME HEAT. IF WATER IS USED, FOG NOZZLES ARE PREFERABLE. FIRE-FIGHTERS SHOULD WEAR SELF CONTAINED BREATHING APPARATUS.

SECTION V - REACTIVITY DATA

STABILITY: STABLE HAZARDOUS POLYMERIZATION: NOT EXPECTED TO OCCUR

INCOMPATIBILITY (MATERIALS AND CONDITIONS TO AVOID):

AVOID CONTACT WITH STRONG ALKALIES, STRONG MINERAL ACIDS, OR STRONG OXIDIZING AGENTS.

HAZARDOUS DECOMPOSITION PRODUCTS:

MAY PRODUCE HAZARDOUS DECOMPOSITION PRODUCTS WHEN HEATED. WELDING, BRAZING, OR FLAME-CUTTING ON SURFACES COATED WITH THIS PRODUCT MAY PRODUCE FUMES INCLUDING: Carbon Monoxide, Oxides of Nitrogen, Formaldehyde

SECTION VI - SPILL OR LEAK PROCEDURES**STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:**

PROVIDE MAXIMUM VENTILATION. ONLY PERSONNEL EQUIPPED WITH PROPER RESPIRATORY AND SKIN AND EYE PROTECTION SHOULD BE PERMITTED IN THE AREA. REMOVE ALL SOURCES OF IGNITION. TAKE UP SPILLED MATERIAL WITH SAWDUST, VERMICULITE, OR OTHER ABSORBENT MATERIAL AND PLACE INTO CONTAINERS FOR DISPOSAL.

WASTE DISPOSAL METHOD:

WASTE MATERIAL MUST BE DISPOSED OF IN ACCORDANCE WITH FEDERAL, STATE, PROVINCIAL, AND LOCAL ENVIRONMENTAL CONTROL REGULATIONS. EMPTY CONTAINERS SHOULD BE RECYCLED OR DISPOSED OF THROUGH AN APPROVED WASTE MANAGEMENT FACILITY.

SECTION VII - HEALTH HAZARD DATA**EFFECTS OF OVEREXPOSURE FROM:****INGESTION:**

- HARMFUL OR FATAL IF SWALLOWED.

EYE CONTACT:

- CAUSES EYE IRRITATION.

SKIN CONTACT:

- MAY CAUSE MODERATE SKIN IRRITATION.

- MAY BE ABSORBED THROUGH THE SKIN.

INHALATION:

- VAPOR AND SPRAY MIST MAY BE HARMFUL IF INHALED.

- VAPOR GENERATED AT ELEVATED TEMPERATURES IRRITATES EYES, NOSE AND THROAT.

CHRONIC OVEREXPOSURE:

AVOID LONG TERM AND REPEATED CONTACT.

- THIS PRODUCT CONTAINS TITANIUM DIOXIDE. ANIMALS INHALING MASSIVE QUANTITIES OF TITANIUM DIOXIDE DUST IN A LONG-TERM STUDY DEVELOPED LUNG TUMORS. STUDIES WITH HUMANS INVOLVED IN MANUFACTURE OF THIS PIGMENT INDICATE NO INCREASED RISK OF CANCER FROM EXPOSURE. POTENTIAL FOR INHALATION OF TITANIUM DIOXIDE DUSTS FROM COATINGS IS VERY LIMITED. SINCE OVEREXPOSURES ARE NOT EXPECTED, THERE IS NO SIGNIFICANT HAZARD FOR MAN.

- THIS PRODUCT CONTAINS DIETHYLENE GLYCOL MONOBUTYL ETHER (DEGBE). DEGBE CONSUMED IN DRINKING WATER AT LOW LEVELS BY RATS FOR 30 DAYS CAUSED INJURY TO EITHER THE LIVER, KIDNEY, SPLEEN, OR TESTES.

- THIS PRODUCT CONTAINS ETHYLENE GLYCOL WHICH MAY CAUSE KIDNEY AND LIVER DAMAGE AND WHICH HAS BEEN SHOWN TO CAUSE BIRTH DEFECTS IN LABORATORY ANIMALS. NO EVIDENCE OF THESE EFFECTS HAS BEEN FOUND IN HUMANS.

SIGNS AND SYMPTOMS OF OVEREXPOSURE:

STILSON LABORATORIES, INC.
170 NORTH HIGH STREET
COLUMBUS OHIO 43215
PHONE - 614-228-2900

REYNOLDS METALS CO.
REYNOLDS RD.
ASHVILLE, OHIO 43103
ATTN: MR. BOB JOHNSON

LAB NO. 17826
JOB 977003
DATE December 5, 1990

LOCATION COLLECTED REYNOLDS METALS F003 F005 SOLIDS

PRESERVATIVES USED

DATE COLLECTED - - - August 31, 1990

TIME COLLECTED - - - 0

DATE RECEIVED - - - August 31, 1990

Test	Result	Unit
TCLP - ZHE EXTRACTION	COMPLETE	
TCLP - EXTRACTION	COMPLETE	
MEK - TCLP	COMPLETE	MG/L
ARSENIC-TCLP	0.017	MG/L
BARIUM-TCLP	2.2	MG/L
CADMIUM-TCLP	4.56	MG/L
CHROMIUM-TCLP	0.03	MG/L
LEAD-TCLP	0.05	MG/L
MERCURY-TCLP	<0.0002	MG/L
SELENIUM-TCLP	0.035	MG/L
SILVER-TCLP	<0.02	MG/L
TCLP - ORGANICS	COMPLETE	

PROJECT MANAGER


TODD W. STOUT

REYNOLDS METALS
TCLP EXTRACTION-MEK
F003 F005 SOLIDS

SLI# 17626

COMPOUND

CONCENTRATION MG/L

METHYL ETHYL KETONE

146

ETILSON LABORATORIES, INC.
170 NORTH HIGH STREET
COLUMBUS OHIO 43215
PHONE - 614-228-2900

REYNOLDS METALS CO.
REYNOLDS DIV.
ASHVILLE, OHIO 43103
ATTN: MR. BOB JOHNSON

LAB NO. 19353
JOB 977002
DATE February 12, 1991

LOCATION COLLECTED REYNOLDS DIRTY SOLVENT

PRESERVATIVES USED

DATE COLLECTED - - - December 27, 1990

TIME COLLECTED - - - 0

DATE RECEIVED - - - December 27, 1990

Test	Result	Unit
MINERAL SPIRITS	<100	MG/L
IGNITABILITY	110	F
METALS	COMPLETE	
GC/MS VOLATILES	COMPLETE	
BTU/LB.	10026	
TCLP - ZHE EXTRACTION	COMPLETE	
TCLP - EXTRACTION	COMPLETE	
ARSENIC-TCLP	<0.005	MG/L
BARIUM-TCLP	3.4	MG/L
CADMIUM-TCLP	0.07	MG/L
CHROMIUM-TCLP	0.54	MG/L
LEAD-TCLP	<0.03	MG/L
MERCURY-TCLP	<0.0002	MG/L
SELENIUM-TCLP	0.016	MG/L
SILVER-TCLP	<0.02	MG/L
VOLATILE ORGANICS (1)	COMPLETE	

PROJECT MANAGER


TODD W. STOUT

REYNOLDS METALS CO.
TCLP VOLATILES
DIRTY SOLVENT

SLI# 19353

COMPOUND	CONCENTRATION	MG/L
BENZENE	<100	
CARBON TETRACHLORIDE	<100	
CHLOROBENZENE	<100	
CHLOROFORM	<100	
1,4-DICHLOROBENZENE	<100	
1,2-DICHLOROETHANE	<100	
1,1-DICHLOROETHYLENE	<100	
METHYL ETHYL KETONE	17600	
TETRACHLOROETHYLENE	<100	
TRICHLOROETHYLENE	<100	
VINYL CHLORIDE	<100	

STILSON LABORATORIES, INC.
170 NORTH HIGH STREET
COLUMBUS OHIO 43215
PHONE - 614-228-2900

REYNOLDS METALS CO.
REYNOLDS RD.
ASHVILLE, OHIO 43103
ATTN: MR. BOB JOHNSON

LAB NO. 8156
JOB 977003
DATE February 23, 1989

LOCATION COLLECTED REYNOLDS METALS CHROME CAKE 12/6/88

PRESERVATIVES USED

DATE COLLECTED - - - December 6, 1988

TIME COLLECTED - - - 0

DATE RECEIVED - - - February 1, 1989

Test	Result	Unit
NICKEL	3.5	MG/KG
CHROMIUM , TOTAL	6700	MG/KG
LEAD	1.0	MG/KG
CADMIUM	2.6	MG/KG
EXTRACTION PROCEDURE	COMPLETE	
CYANIDE	<0.002	MG/KG
METALS	COMPLETE	
CADMIUM-TCLP	0.016	MG/L
CHROMIUM-TCLP	43.0	MG/L
LEAD-TCLP	<0.05	MG/L
NICKEL-TCLP	0.04	MG/L
CADMIUM-EP	<0.01	MG/L
CHROMIUM-EP	0.7	MG/L
LEAD-EP	<0.05	MG/L
NICKEL-EP	<0.03	MG/L

PROJECT MANAGER


TODD W. STOUT



REYNOLDS ALUMINUM

Reynolds Metals Company • Construction Products Division • Building Products Group
Reynolds Road • Ashville, Ohio 43103 • (614)983-2571

O: WMD-
CC: RF
Exp. 062765278

March 30, 1989

USEPA REGION V
Regional Administrator's Office
230 S. Dearborn Street
Chicago, IL 60604

Dear Sir or Madam:

Please find enclosed Reynolds Metals Company's Ashville Plant Demonstration Statement, with certification of improved post treatment yielding greater environmental benefit than stated in our August 19, 1988 statement. This is required by 40 CFR 268.8.

If you are in need of further information or have questions regarding this submission, please contact me at (614) 983-2571, Ext. 365.

Sincerely,

REYNOLDS METALS COMPANY
USEPA I.D. NO. OHD055352512

R. G. Johnson
Plant Engineer

RDJ/jvp

Enc.

cc: R. L. Bryant
J. S. Hammer
R. Mait, EXO
S. Ball, Chemical Waste Management

RECEIVED

MAR 31 1989

U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

USEPA REGION V
REGIONAL ADMINISTRATOR'S OFFICE
230 S. DEARBORN STREET
CHICAGO, IL 60404

RE: F019 WASTE
USEPA NO. OHD055352512

CERTIFICATION STATEMENT

This is to certify that the above referenced waste has been post treated yielding greater environmental benefit than stated in my August 19, 1988 certification statement. This waste will be treated by Chemical Waste Management, Adams Center Landfill, Fort Wayne, Indiana.

"I certify, under penalty of law, that the requirements of 40CFR 268.8 (a) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit at the present time. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment."

NOTIFICATION STATEMENT

"Between 8/8/88 and 5/8/90, waste specified in Section 268.10 for which treatment standards under Subpart D of this part are not applicable, including those wastes which are subject to the statutory prohibitions of RCRA 3004 (d) or codified prohibitions under Section 268.32 of this part but not including wastes subject to treatment standard under Section 268.42 of this part, are prohibited from disposal in a landfill or surface impoundment unless the wastes are the subject of a valid demonstration and certification pursuant to Section 268.8."

R. G. Johnson

Plant Engineer



3-30-89

0043 OH
2 BK OK



O: WMD ✓
CC: RF
FREEMAN

REYNOLDS ALUMINUM

Reynolds Metals Company • Construction Products Division • Building Products Group
Reynolds Road • Ashville, Ohio 43103 • (614)983-2571

August 19, 1988

USEPA REGION V
Regional Administrator's Office
230 S. Dearborn Street
Chicago, IL 60604

Dear Sir or Madam:

Please find enclosed Reynolds Metals Company's Ashville Plant Demonstration Statement, with explanative enclosures, as required by 40CFR 268.8.

If you are in need of further information or have questions regarding this submission, please contact me at (614) 983-2571.

Sincerely,

REYNOLDS METALS COMPANY
USEPA I.D. No. OHD055352512

R. G. Johnson
Plant Engineer

RGJ/km

cc: R. L. Bryant
J. S. Hammer
A. M. Doherty

Enclosures

RECEIVED
AUG 24 1988
U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

ATTACHMENT A

USEPA REGION V
REGIONAL ADMINISTRATOR'S OFFICE
230 S. DEARBORN STREET
CHICAGO, IL 60604

RE: F019 WASTE
USEPA No. OHD055352512

CERTIFICATION STATEMENT

This is to certify that the above referenced waste has been treated by the best practically available methods.

"I certify, under penalty of law, that the requirements of 40CFR 268.8 (a) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment."

NOTIFICATION STATEMENT

"Between 8/8/88 and 5/8/90, waste specified in Section 268.10 for which treatment standards under Subpart D of this part are not applicable, including those wastes which are subject to the statutory prohibitions of RCRA 3004 (d) or codified prohibitions under Section 268.32 of this part but not including wastes subject to treatment standard under Section 268.42 of this part, are prohibited from disposal in a landfill or surface impoundment unless the wastes are the subject of a valid demonstration and certification pursuant to Section 268.8."

R. G. Johnson

Plant Engineer



8/19/88

ATTACHMENT B

Operating & Control Parameters

for

Reynolds Metals Company's

Ashville Extrusion and Coil Coating Line

Introduction

Proper surface preparation of extruded and coiled aluminum stock must precede the actual coating or painting of the base metal. The Reynolds Metals Company's extrusion and coil coating line incorporates a preliminary surface preparation step known as chromating. Chromating consists of passing the base metal through an aqueous solution containing hexavalent chromium. After rinsing, the base metal is further coated and dried in accordance with individual product specifications. The spent chromating solutions and rinses constitute the influent to the chrome treatment process.

The chemical treatment of chromating wastes has a long and successful history. While there are a variety of treatment methods the most common method of treatment involves the reduction of hexavalent chromium (Cr+6) to trivalent chromium (Cr+3) and the subsequent precipitation and removal of chromium as a hydroxide sludge.

Operating Parameters

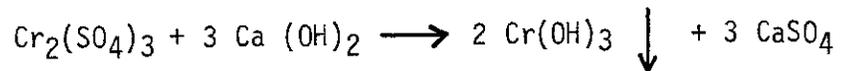
Reynolds employs sulfur dioxide (SO₂) and sulfuric acid (H₂SO₄) as a reducing agent in the Ashville Waste Treatment Plant. The reduction of Cr⁺⁶ to Cr⁺³ is pH dependent and goes to completion even at a pH as high as 4.5.

ATTACHMENT B

The precipitation of chromium (III) hydroxide is accomplished by the addition of calcium hydroxide (Ca(OH)₂) which reacts with the Cr⁺³ and, at the same time, adjusts the pH to obtain maximum precipitation. Our treatment plant slakes its own lime as follows:



The lime slurry is metered into the clarifier with the reduced chromium being precipitated as a hydroxide sludge as follows:



The chromium (III) hydroxide sludge is removed after clarification and dewatered by vacuum filtration.

ATTACHMENT B

Control Parameters

The chemical reduction tank is where the actual reduction of the hexavalent chromium to trivalent chromium takes place. The pH of this tank is automatically maintained between 2.6 to 2.9.

The instrumentation in the chemical reduction tank consists of a pH recorder/controller and an ORP recorder/controller. The ORP, i.e., oxidation-reduction potential, is a measure of the reduction of hexavalent chromium to trivalent. Both the pH and ORP meters continuously monitor the conditions in the reduction tank and in turn the reduction of hexavalent chromium. The ORP is a direct indication that the hexavalent chromium in the treatment system is in fact being reduced. With the ORP recorder/controller being adjusted to a predetermined set point visual inspection of the recorder will immediately indicate the effectiveness of the treatment system. The instrumentation of the system is designed to provide control of the treatment system with an additional backup consisting of frequent and routine operator supervision.

In the precipitation tank, lime slurry is added to elevate the pH to a range of 6.9 to 7.5. The maximum precipitation of trivalent chromium occurs at this pH range. The pH is adjusted and maintained at this range by a pH recorder/controller which regulates the rate of flow of lime slurry to the precipitation tank. A flocculant is added to enhance precipitation.

Additionally, the effectiveness of the treatment system is easily visualized by the bluish green coloration of the chromium (III) hydroxide sludge. Proper reduction
coloration ?

ATTACHMENT B

of the hexavalent chromium is evidenced by the distinctive blue-green color of sludge. Any potential for treatment system upsets would quickly be detected by variation this characteristic sludge color and by the readings registered on the monitoring equipment.

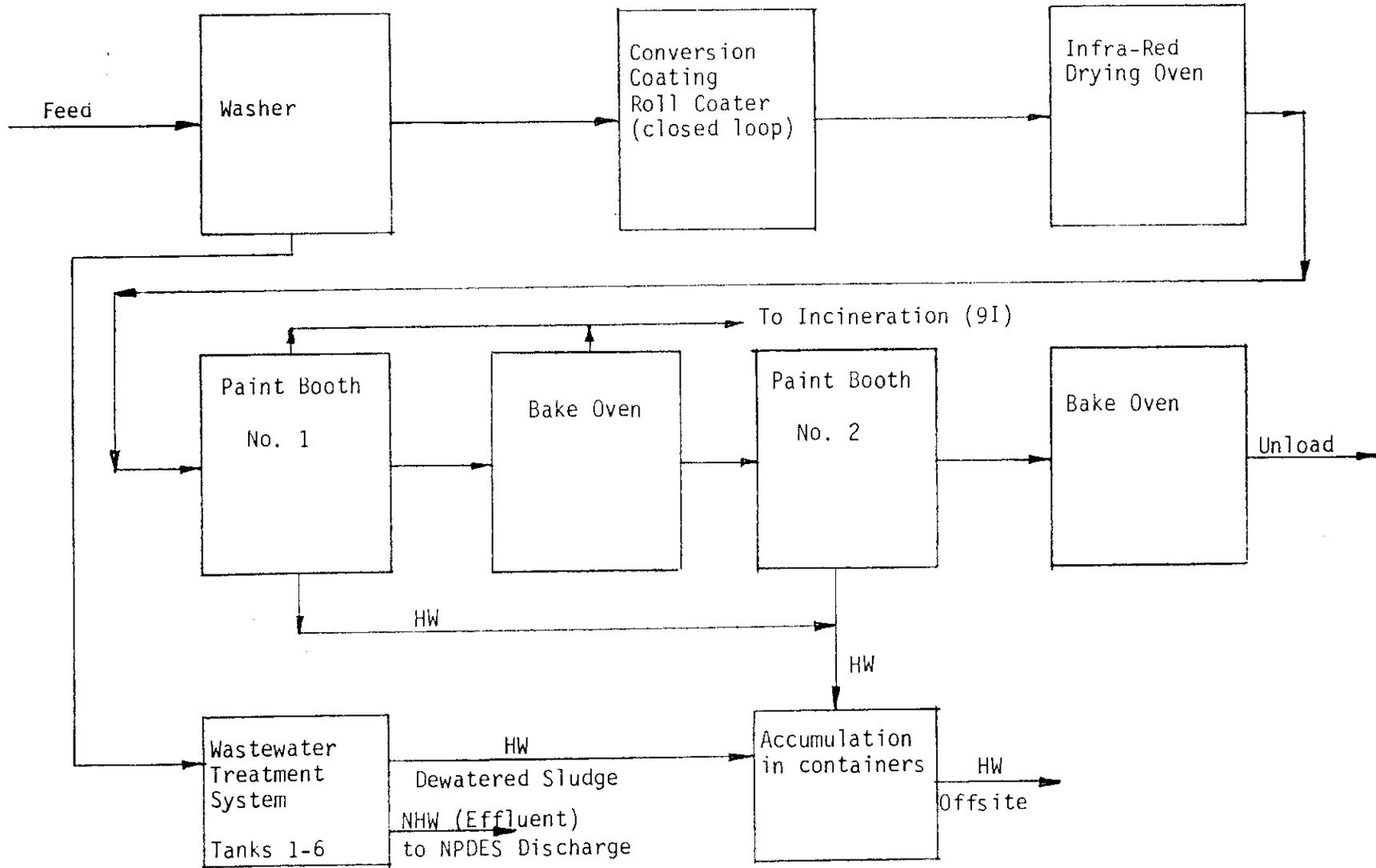
A recent laboratory analysis performed by our control laboratory is attached, illustrating the effectiveness of the chromium reduction process employed at this facility. (See Attachments F & G).

You will note on Attachment F (influent to the treatment plant) the concentration of 7MG/L of hexavalent chromium.

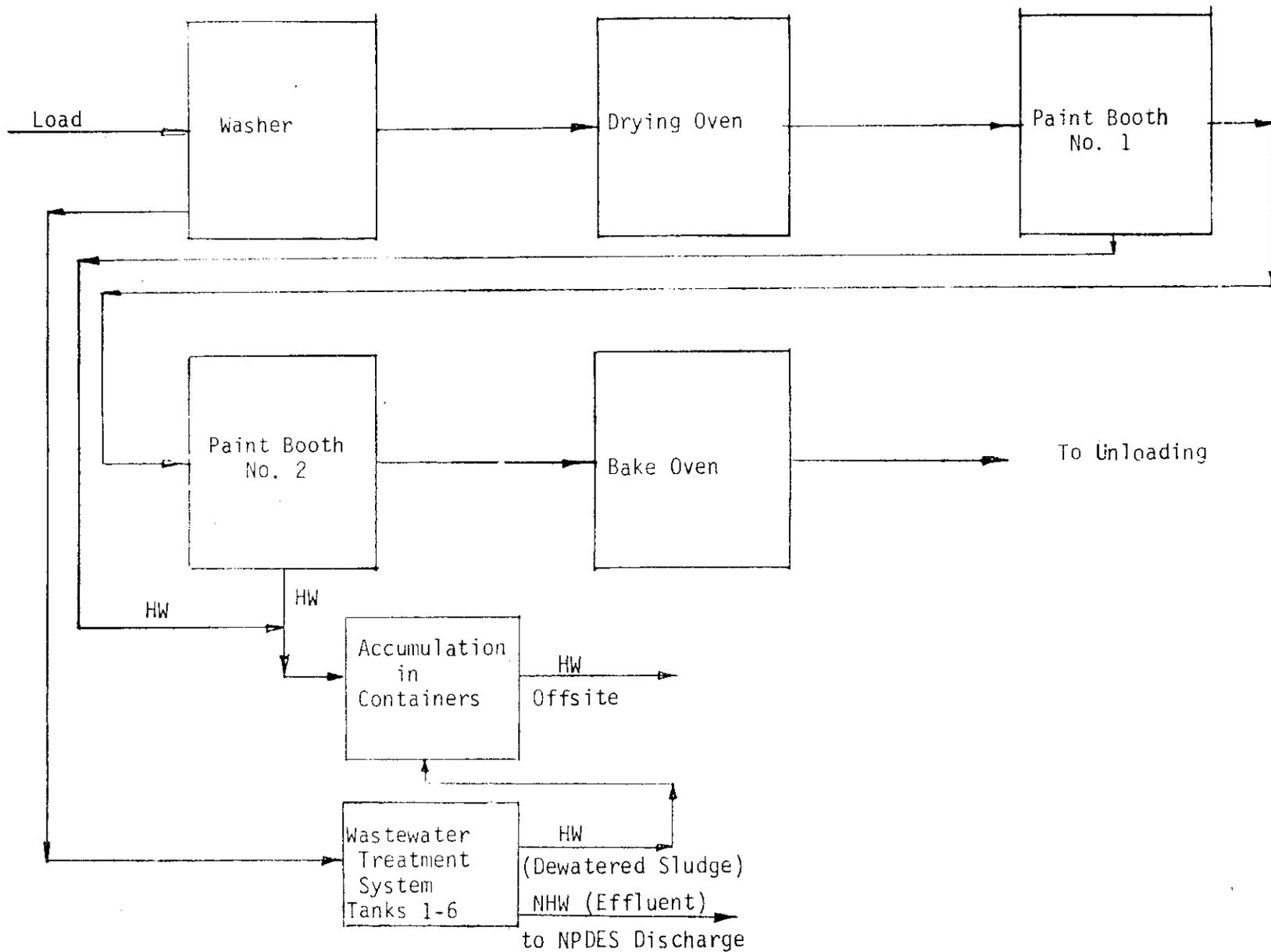
On Attachment G (dewatered hydroxide sludge) you will note the conversion of hexavalent chromium to trivalent chromium with the hexavalent chromium below detectable limits.

Refer to Attachments C & D for Waste Source diagrams.

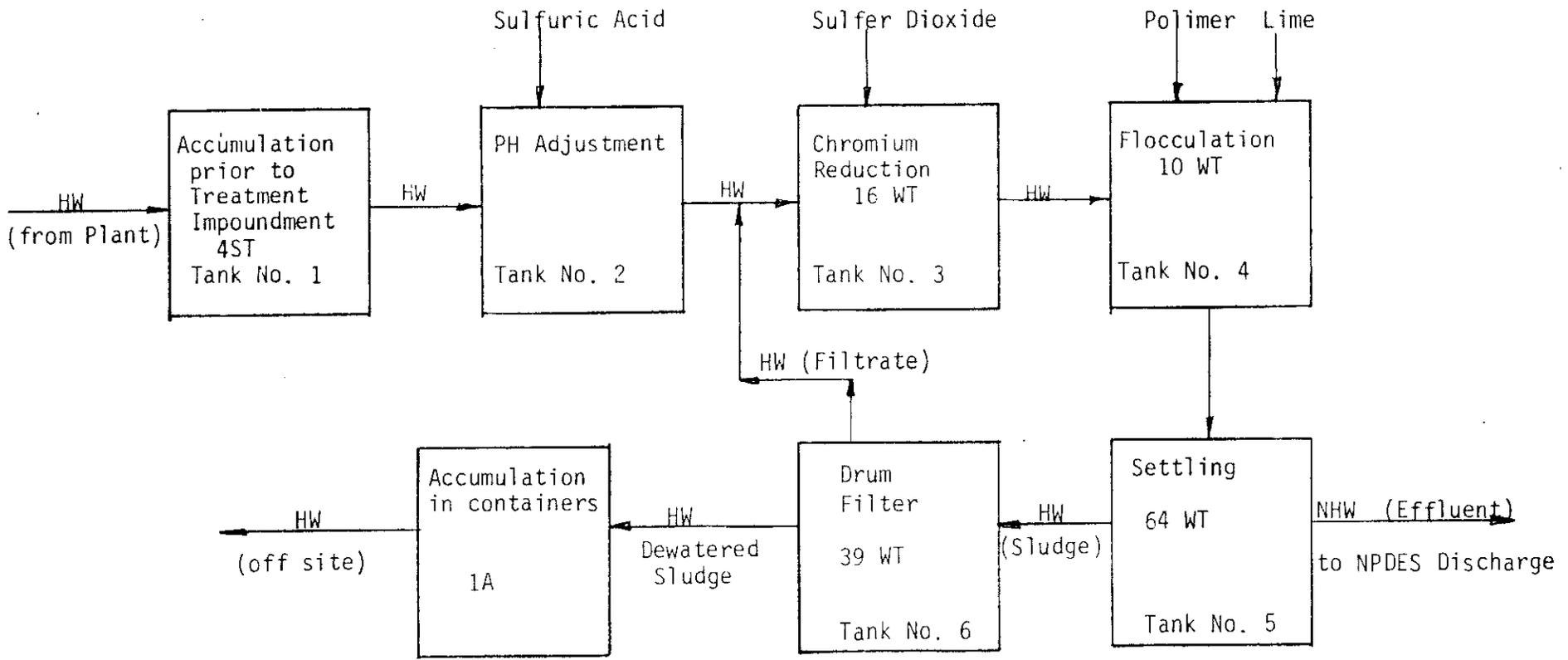
Refer to Attachment E for Waste Treatment diagrams.



COILED ALUMINUM PRODUCT
 PAINT SYSTEM FLOW DIAGRAM



EXTRUDED ALUMINUM PRODUCT
PAINT SYSTEM FLOW DIAGRAM



WASTEWATER TREATMENT SYSTEM

ATTACHMENT E

ATTACHMENT F

STILSON LABORATORIES, INC.
170 NORTH HIGH STREET
COLUMBUS, OHIO 43215
PHONE - 614-228-4385

REYNOLDS METALS CO.
REYNOLDS RD.
ASHVILLE, OHIO 43103
ATTN: MR. BOB JOHNSON

LAB NO. 5048
JOB 977003
DATE August 19, 1988

LOCATION COLLECTED REYNOLDS METAL CO. FLOW COMING INTO W.T.

PRESERVATIVES USED

DATE COLLECTED - - - August 10, 1988

TIME COLLECTED - - - 0

DATE RECEIVED - - - August 10, 1988

Test	Result	Unit
CHROMIUM, TRIVALENT	1.85	MG/L
CHROMIUM, HEX	7.0	MG/L

PROJECT MANAGER W. Walker
STILSON T. HALPER

ATTACHMENT G

STILSON LABORATORIES, INC.
170 NORTH HIGH STREET
COLUMBUS OHIO 43215
PHONE - 614-228-4385

REYNOLDS METALS CO.
REYNOLDS RD.
DESMILLE, OHIO 43103
ATTN: MR. BOB JOHNSON

LAS NO. 5045
JOB 977003
DATE August 18, 1988

LOCATION COLLECTED REYNOLDS METAL CO. N.O.S. DRK-E #9189 .

PRESERVATIVES USED

DATE COLLECTED - - - August 10, 1988

TIME COLLECTED - - - 0

DATE RECEIVED - - - August 10, 1988

Test	Result	Unit
CHROMIUM, TRIVALENT	3150	MG/KG
CHROMIUM, HEX	<0.75	MG/KG

PROJECT MANAGER


WILSON T. WALKER

Ohio EPA

Re: Pickaway County
USEPA No.: OHD055352512
Ohio EPA No.: 01-65-0040

STATUS 0

Mr. Bob Johnson, Environmental Engineer
Reynolds Metals Company
Reynolds Road
Box 12
Ashville, Ohio 43103

June 22, 1983

Dear Mr. Johnson:

On May 23, 1983, Reynolds Metals Company was inspected to determine if it was in compliance with applicable rules and regulations of the U.S. and Ohio EPA regarding the generation, storage, treatment, and disposal of hazardous waste.

The results of this inspection indicates that Reynolds Metals Company is in substantial compliance with applicable hazardous waste regulations that were in effect at the time of the inspection. This facility is a Generator that stores in containers for more than 90 days and has submitted a Part A Permit Modification to the U.S. and Ohio EPA to indicate this.

A copy of the inspection report is enclosed with this letter. Please contact me at (614-462-8394) if you have any questions or concerns with the report.

Sincerely,



Debbie Unger
Division of Hazardous Materials Management

DU/sc

cc: Ms. Paula Cotter; Enforcement, Ohio EPA
cc: Mr. Ken Westlake; SIO, Region V, U.S. EPA

Enclosures

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 01-65-0040

PART I. GENERAL INFORMATION

U.S. EPA I.D. # OHD055352512

Facility: Reynolds Metals Company Building Products Plant Address: Reynolds Road; Box 12 City: Ashville
 State: Ohio Zip Code: 43103 County: Pickaway Telephone: 614-983-2571

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	<u>Mr. Bud Munson</u>	<u>Maintenance Supervisor</u>	<u>614-983-2571</u>
2.	<u>Mr. Johnson</u>	<u>Environmental Engineer</u>	<u>614-983-2571</u>
3.			

INSPECTOR(S)

1.	<u>Ms. Debbie Unger</u>	<u>Division of Hazardous Materials</u>	<u>614-462-8394</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- Generator only (G)
- Transporter (T)
- TSDF only
- G-T
- G-TSDF
- T-TSDF
- G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure
- Containers S01
- Tanks S02/T01
- Surface Impoundments S04/T02
- Incineration/Thermal Treatment
- Waste Piles S03
- Land Treatment D81
- Landfills D80
- Chemical/Physical/Biological T04
- Groundwater Monitoring
- Post-Closure

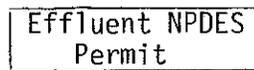
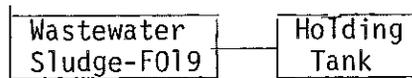
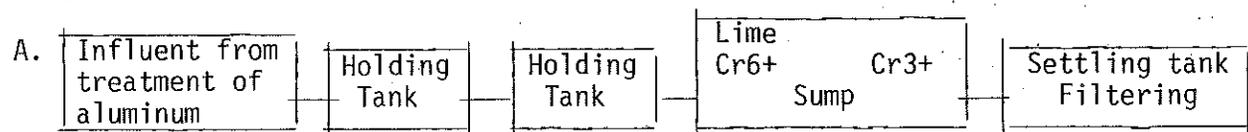
RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has the facility submitted a Part A to Ohio?	X			
2. If "yes", is it complete and accurate?		X		No. 1
3. Has the facility submitted a Part B?		X		

REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

1. This facility submitted a Part A Permit Modification on August 4, 1982 to become a T/S/D site for storage of F019 and F003 in drums only. The original Part A Permit is not an accurate reflection of the RCRA activities at this plant. The process of treating the hexavalent chromium to trivalent chromium meets the definition of a "Wastewater Treatment Unit" as defined in 40 CFR 260.10 and 3745-50-10(A)(90) of the Federal and State Regulations.



- B. Paint Waste - F003, is an ignitable listed hazardous waste stored in containers on a concrete pad away from the main facility.
- C. The Groundwater Monitoring Section of this report is not enclosed. A Permit Modification was submitted August, 1982, by this facility to the Division of Hazardous Materials to change the status of having surface impoundments to having a "Wastewater Treatment Unit" that is regulated by the Clean Water Act. The sludge from the filtering of the influent is a listed hazardous waste-F019.

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<u> </u>	<u> </u>	<u>Intend to when needed</u>	<u> </u>
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))	<u>X</u>	_____	_____	_____
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) <u>or less</u> is affixed with a completed hazardous waste label as required by Section 262.32(b).	<u>X</u>	_____	_____	_____
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	<u>X</u>	_____	_____	_____
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.	_____	_____	<u>X</u>	_____
7. If the generator elects to store hazardous waste on-site in <u>containers or tanks for 90 days</u> or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	_____	_____	<u>X</u>	_____
b) The date that accumulation began is clearly marked on each container.	_____	_____	<u>X</u>	_____
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).	<u>X</u>	_____	_____	_____
9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).	<u>X</u>	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards	D: Contingency and Emergency	G: Closure
C: Preparedness and Prevention	E: Manifest/Records/Reporting	H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the wastematerial containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	X	_____	_____	_____
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	X	_____	_____	_____
3. a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).	_____	X	_____	_____
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).	_____	X	_____	_____
IF <u>BOTH</u> 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, <u>or</u>	X	_____	_____	_____
b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)).	X	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	<u>X</u>	_____	_____	_____
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)	<u>X</u>	_____	_____	_____
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4))	<u>X</u>	_____	_____	_____
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<u>X</u>	_____	_____	_____
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	<u>X</u>	_____	_____	_____
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17).				
a) Protection from sources of ignition.	<u>X</u>	_____	Ignitable	_____
b) Physical separation of incompatible waste materials.	_____	_____	X	_____
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>X</u>	_____	_____	_____
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).	<u>X</u>	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	_____	<u>X</u>	_____	_____
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
a) Internal alarm system.	<u>X</u>	_____	_____	_____
b) Access to telephone, radio or other device for summoning emergency assistance.	<u>X</u>	_____	_____	_____
c) Portable fire control equipment.	<u>X</u>	_____	_____	_____
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	<u>X</u>	_____	_____	_____
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	<u>X</u>	_____	_____	_____
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	<u>X</u>	_____	_____	_____
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)	<u>X</u>	_____	_____	_____
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a))	<u>X</u>	_____	_____	_____
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b))	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

- | | | | | |
|---|----------|---------------|----------------|---------------|
| 1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components: | | | | |
| a) Actions to be taken by personnel in the event of an emergency incident. | <u>X</u> | _____ | _____ | _____ |
| b) Arrangements or agreements with local or state emergency authorities. | <u>X</u> | _____ | _____ | _____ |
| c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. | <u>X</u> | _____ | _____ | _____ |
| d) A list of all emergency equipment including location, physical description and outline of capabilities. | <u>X</u> | _____ | _____ | _____ |
| e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) | <u>X</u> | _____ | _____ | _____ |
| 2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) | <u>X</u> | _____ | _____ | _____ |
| 3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) | <u>X</u> | _____ | _____ | _____ |
| 4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) | <u>X</u> | _____ | _____ | _____ |
| 5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56. | | | | |
| | _____ | <u>Intend</u> | <u>to when</u> | <u>needed</u> |

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

- | | | | | |
|---|----------|-------|----------|-------|
| 1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information: | | | | |
| a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1)) | <u>X</u> | _____ | _____ | _____ |
| b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s). | <u>X</u> | _____ | _____ | _____ |
| c) The estimated (or actual) weight, volume or density of the waste material(s). | <u>X</u> | _____ | _____ | _____ |
| d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980). | <u>X</u> | _____ | _____ | _____ |
| e) The present physical location of each hazardous waste within the facility. | <u>X</u> | _____ | _____ | _____ |
| f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) | _____ | _____ | <u>X</u> | _____ |
| g) Records of any waste analyses and trial tests required to be performed. | _____ | _____ | <u>X</u> | _____ |
| h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B). | _____ | _____ | <u>X</u> | _____ |
| i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). | _____ | _____ | <u>X</u> | _____ |
| j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G. | _____ | _____ | <u>X</u> | _____ |

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
<u>NOTE</u> : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO <u>ONLY</u> OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.				
3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b))	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2))	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director.	<u> </u>	<u> </u>	<u> </u>	<u>Intend to when needed</u>
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
a) A description of how and when the facility will be closed. (265.112(a)(1)).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	<u>X</u>	_____	_____	Containers only
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)	<u>X</u>	_____	_____	_____
d) A description of steps taken to decontaminate facility equipment.	<u>X</u>	_____	_____	_____
e) The year closure is expected to begin and a schedule for the various phases of closure.	<u>X</u>	_____	_____	_____
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	_____	_____	_____	Will when needed
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	_____	_____	<u>X</u>	_____

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)				
a) A closure trust fund, or	_____	_____	_____	_____
b) A surety bond, or	_____	_____	_____	_____
c) A closure letter of credit, or	_____	_____	_____	_____
d) A combination of financial mechanisms. *	_____	_____	_____	_____

NOTE : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.
 * Closure Insurance and another insurance policy to cover liability.

RCRA INTERIM STATUS INSPECTION FORM

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>X</u>	<u> </u>	<u> </u>	<u> </u>

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	<u>X</u>	_____	_____	_____
b) In good physical condition (265.171)	<u>X</u>	_____	_____	_____
c) Compatible with the wastes stored in them (265.172)	<u>X</u>	_____	_____	_____
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	<u>X</u>	_____	_____	_____
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	<u>X</u>	_____	_____	_____
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	<u>X</u>	_____	_____	_____
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	<u>X</u>	_____	_____	_____
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))	_____	<u>X</u>	_____	_____

OH EPA

Re: Pickaway County
U.S. EPA No.: OHD055352512
Ohio HWFAB No.: 01-65-0040

Debbie Ungar 614/466-6450

Part A - 800/421-9318
2567

June 18, 1982

Mr. Charles Bent
Environmental Engineer
Reynolds Metals Company
P.O. Box 27003
Richmond, Virginia 23261

Dear Mr. Bent:

On May 26, 1982, Ken Humphrey and I visited Reynolds Aluminum in Ashville to determine if the facility was in compliance with applicable rules and regulations of the U.S. and Ohio EPA regarding the generation, storage, treatment and disposal of hazardous waste.

During the inspection we discussed the changes to be made on the Part A Interim Status Permit. They are as follows:

1. Former S04 and T04 processes meet the definition of a "Wastewater Treatment Unit" as defined in 40 CFR 260.10 under interim status requirements. Therefore these codes need not be shown on the revised application.
2. Since the treatment process formerly listed as D007 code number is included in the wastewater treatment unit, the D007 should be deleted from the permit application.
3. If the paint waste is not E.P. Toxic for lead-D008, then F003 code number should be used to describe this material.

In order to make appropriate changes to the Part A Permit, a Permit Modification Request should be submitted to the Hazardous Waste Facilities Approval Board. The request should include:

- a) An amended Part A
- b) A narrative explaining the request.
- c) Any detail plans or specifications needed to clarify the request.

Page - 2 - Pickaway County

U.S. EPA No.: OHD055352512

Ohio HWFAB No.: 01-65-0040

Please send one copy of the Permit Modification Request to me and one copy to:

Ms. Peggy Vince *Thomas Crepeau*
~~HWFAB~~ *Permits*
361 East Broad Street
Columbus, Ohio 43215

I have enclosed the inspection report, so please call (614-466-6450) if you have any questions.

Sincerely,



Debbie Unger
Environmental Scientist

DU/sc

cc: Mr. Bud Munson, Maintenance Manager
cc: Ms. Paula Cotter, DHM, Ohio EPA, C.O.
cc: Ms. Kathy Homer, SIO, U.S. EPA, Region V
cc: Mr. Bob Fragale, HWFAB, C.O.

RCRA INTERIM STATUS INSPECTION FORM

U.S. EPA I.D. NO. OHD055352512

PART 1. GENERAL INFORMATION

Facility: Reynolds Aluminum Building Products Address: Reynolds Road, P.O. Box 12

City: Ashville State: Ohio Zip Code: 43103 Telephone: 614-983-2571

Facility Operator: Mr. R. F. Seip Title: Plant Manager Telephone: 614-983-2571

Facility Owner: Reynolds Metals Address: 6601 West Broad Street, P.O. Box 27003

City: Richmond State: Virginia Zip Code: 23261 Telephone: 804-281-2000

Type of Ownership: Private Government State HWFAB No. 01-65-0040

Date of Inspection: May 26, 1982 Time of Inspection: (Start) 10:00 AM (Finish) 1:00 PM

Advance Notification? No Yes: _____

Weather Conditions: Sunny and Warm

County: Pickaway

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Mr. Charles Bent</u>	<u>Environmental Engineer</u>	<u>804-281-2918</u>
2.	<u>Mr. Bud Munson</u>	<u>Maintenance Supervisor</u>	<u>614-983-2571</u>
3.	_____	_____	_____
4.	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

(Name)	(Title)	(Telephone)
1. <u>Ms. Debbie Unger</u>	<u>Environmental Scientist</u>	<u>614-466-6450</u>
2. <u>Mr. Ken Humphrey</u>	<u>Environmental Scientist</u>	<u>614-466-1584</u>
3. _____	_____	_____
4. _____	_____	_____

1. Type(s) of hazardous waste site activity: A. Generation B. Storage C. Treatment
D. Transportation E. Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F019 - precipitation of trivalent chromium sludge
F003 - waste solvents after cleanup of equipment

b) Non-Listed Wastes: I C R E
 D001 D002 D003 D004-D017

3. Has this facility submitted a Part A Permit Application? Yes No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

 Yes, See Remark # No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ X No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) X No

a) P.U.C.O. Registration Number _____

7. A brief description of site activity:

This facility makes residential and commercial aluminum siding. They are storing hazardous waste in drums only. The process of treating the hexavalent chromium to trivalent chromium meets the definition of a "Wastewater Treatment Unit". The waste sludge collected after the treatment process is F019. They are checking into CECOS as possible disposer.

Site Activity:		S	T	D
Containers	I	X		
Tanks	J			
Surf. Imp.	K			
Waste Pile	L			
Land Treat.	M			
Landfill	N			
Incineration	O			
Thermal Treat.	P			
Chem/Phys/Biol	Q			
Under. Inj.	R			

REMARKS, PART 1. (GENERAL INFORMATION)

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<u>X</u>	_____	_____	_____
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	_____	<u>X</u>	_____	_____
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<u>X</u>	_____	_____	<u>No. 1</u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<u>X</u>	_____	_____	_____
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<u>X</u>	_____	_____	_____
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<u>X</u>	_____	_____	_____
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<u>X</u>	_____	_____	_____
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<u>X</u>	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	<u>X</u>	_____	_____	_____
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	<u>X</u>	_____	_____	_____
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	<u>X</u>	_____	_____	_____
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	<u>X</u>	_____	_____	<u>Part A</u>
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	<u>X</u>	_____	_____	<u>Part B</u>
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	_____	_____	<u>X</u>	_____
8. If the generator elects to store hazardous waste on-site in <u>containers or tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:				
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	_____	_____	X	_____
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	_____	_____	X	_____
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	_____	_____	X	_____
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	_____	_____	X	_____
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	_____	_____	X	_____
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	_____	_____	X	_____
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	_____	_____	X	_____
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	X	_____	_____	_____
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	X	_____	_____	_____

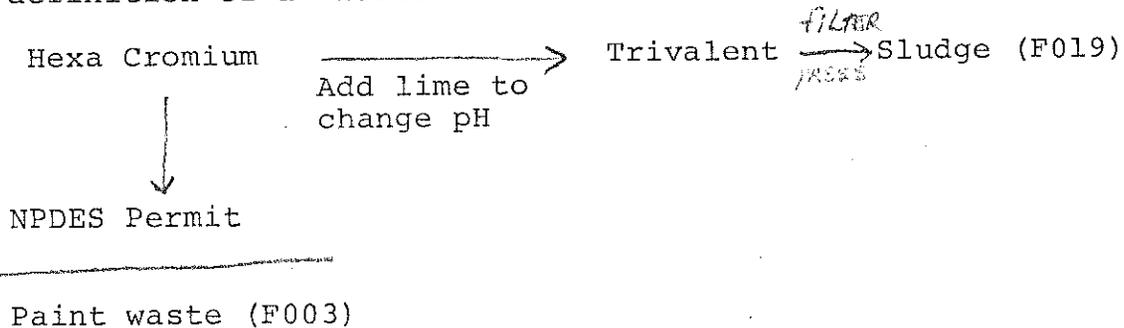
RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.			X	

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

1. The treatment of hexavalent chromium with lime to change it to trivalent chromium meets the definition of a "Wastewater Treatment Unit"



RCRA INTERIM STATUS INSPECTION FORM

PART 3. TRANSPORTER REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).	_____	_____	<u>X</u>	_____
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.	_____	_____	<u>X</u>	_____
3. The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.	_____	_____	<u>X</u>	_____
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20 (d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).	_____	_____	<u>X</u>	_____
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).	_____	_____	<u>X</u>	_____
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.	_____	_____	<u>X</u>	_____
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).	_____	_____	<u>X</u>	_____
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	_____	_____	<u>X</u>	_____
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30 (a) and 3745-53-30-A).	_____	_____	<u>X</u>	_____

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?	_____	_____	<u>X</u>	_____
c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?	_____	_____	<u>X</u>	_____
9. Does the transporter store hazardous wastes temporarily while they are in transit?	_____	_____	<u>X</u>	_____
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)	_____	_____	<u>X</u>	_____

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?	_____	_____	<u>X</u>	_____
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?	_____	_____	<u>X</u>	_____

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards	E: Manifest/Records/Reporting	H: Financial Requirements
C: Preparedness and Prevention	F: Ground Water Monitoring	
D: Contingency and Emergency	G: Closure	

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<u>X</u>	_____	_____	_____
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<u>X</u>	_____	_____	_____
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	<u>X</u>	_____	_____	_____
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<u>X</u>	_____	_____	_____
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<u>X</u>	_____	_____	_____
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<u>X</u>	_____	_____	_____

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	<u>X</u>	_____	_____	_____
a) Inspect emergency equipment.	<u>X</u>	_____	_____	_____
b) Inspect monitoring equipment.	<u>X</u>	_____	_____	_____
c) Inspect security, alarm and communications devices.	<u>X</u>	_____	_____	_____
d) Inspect process equipment (pipes, pumps, etc.).	_____	_____	<u>X</u>	_____
e) Inspect containment structures (dikes, curbs, etc.).	_____	_____	<u>X</u>	_____
f) Inspect facility for structural malfunctions (roof, floor, etc.).	<u>X</u>	_____	_____	_____
g) Inspect hazardous waste handling/loading areas each day used.	<u>X</u>	_____	_____	_____
h) Record of any malfunctions due to equipment or operator errors.	<u>X</u>	_____	_____	_____
i) Record of any hazardous waste discharges.	<u>X</u>	_____	_____	<u>Intend to when needed</u>
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<u>X</u>	_____	_____	_____
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	<u>X</u>	_____	_____	_____
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	_____	_____	<u>X</u>	_____

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	_____	_____	<u>X</u>	_____
b) Physical separation of incompatible waste materials.	_____	_____	<u>X</u>	_____
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	_____	_____	<u>X</u>	_____
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	_____	_____	<u>X</u>	_____

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste, at this facility? (265.31 and 3745-55-31).	<u>X</u>	_____	_____	_____
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<u>X</u>	_____	_____	_____
a) Internal alarm system	<u>X</u>	_____	_____	_____
b) Access to telephone, radio or other device for summoning emergency assistance.	<u>X</u>	_____	_____	_____
c) Portable fire control equipment.	<u>X</u>	_____	_____	_____
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<u>X</u>	_____	_____	_____
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<u>X</u>	_____	_____	_____
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<u>X</u>	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	<u>X</u>	_____	_____	_____
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	<u>X</u>	_____	_____	_____
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	_____	_____	<u>X</u>	_____

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	<u>X</u>	_____	_____	_____
a) Actions to be taken by personnel in the event of an emergency incident.	<u>X</u>	_____	_____	_____
b) Arrangements or agreements with local or state emergency authorities.	<u>X</u>	_____	_____	_____
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<u>X</u>	_____	_____	_____
d) A list of all emergency equipment including location, physical description and outline of capabilities.	<u>X</u>	_____	_____	_____
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	<u>X</u>	_____	_____	_____
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	<u>X</u>	_____	_____	_____

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	_____	<u>X</u>	_____	<u>No. 2</u>
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	_____	<u>X</u>	_____	<u>No. 2</u>
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	_____	_____	_____	<u>Not needed to yet</u>

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	<u>X</u>	_____	_____	_____
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	<u>X</u>	_____	_____	_____
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	<u>X</u>	_____	_____	_____
c) The estimated (or actual) weight, volume or density of the waste material(s).	<u>X</u>	_____	_____	_____
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	<u>X</u>	_____	_____	_____

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
e) The present physical location of each hazardous waste within the facility.	<u>X</u>	_____	_____	_____
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	_____	_____	<u>X</u>	_____
g) Records of any waste analyses and trial tests required to be performed.	_____	_____	<u>X</u>	_____
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	_____	_____	<u>X</u>	_____
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	_____	_____	<u>X</u>	_____
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	_____	_____	<u>X</u>	_____
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	_____	_____	<u>X</u>	_____
 <u>NOTE:</u> THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.				
3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	_____	_____	<u>X</u>	_____
 <u>NOTE:</u> THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO <u>ONLY</u> OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.				
4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).	<u>X</u>	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	_____	_____	<u>X</u>	_____
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	_____	_____	<u>X</u>	_____
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	_____	_____	<u>X</u>	_____
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	_____	_____	<u>X</u>	_____

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.	_____	_____	<u>X</u>	_____
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	_____	_____	<u>X</u>	_____

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	<u>X</u>	_____	_____	_____
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	<u>X</u>	_____	_____	_____
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	<u>X</u>	_____	_____	_____
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	<u>X</u>	_____	_____	_____
d) A description of steps taken to decontaminate facility equipment.	<u>X</u>	_____	_____	_____
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	<u>X</u>	_____	_____	_____
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	_____	<u>X</u>	_____	<u>No. 3</u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	_____	_____	<u>X</u>	_____
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	_____	_____	<u>X</u>	_____
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	_____	_____	<u>X</u>	_____
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	_____	_____	<u>X</u>	_____
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	_____	_____	<u>X</u>	_____

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	_____	_____	<u>X</u>	_____
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	_____	_____	<u>X</u>	_____
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	_____	_____	<u>X</u>	_____
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.	_____	_____	<u>X</u>	_____

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).	<u>X</u>	_____	_____	_____
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NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL APRIL 13, 1982 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

2. Please revise the Contingency Plan according to the storage changes. Also, include the name of the new Emergency Coordinator.
3. Review the Closure Plan to make any necessary changes due to changing the permit status.

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	X	_____	_____	_____
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	X	_____	_____	_____

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	_____	_____	X	_____
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	_____	_____	X	_____

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	_____	<u>X</u>	_____	_____

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-feet, cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	_____	_____	<u>X</u>	_____
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	_____	_____	<u>X</u>	_____
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).	_____	_____	<u>X</u>	_____
4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).	_____	_____	<u>X</u>	_____
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).	_____	_____	<u>X</u>	_____
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	_____	_____	<u>X</u>	_____
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).	_____	_____	<u>X</u>	_____
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	_____	_____	<u>X</u>	_____
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	_____	_____	<u>X</u>	_____
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).	_____	_____	<u>X</u>	_____
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).	_____	_____	<u>X</u>	_____
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).	_____	_____	<u>X</u>	_____

Subpart K: Surface Impoundments

1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).	_____	_____	<u>X</u>	_____
2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04).	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The level of freeboard in the Surface Impoundment is inspected at least once each operating day, the structural containment system is inspected at least once per week and all such inspections are documented (Sections 265.226 and 3745-57-07).	_____	_____	<u>X</u>	_____
4. Has the facility ever recorded an unplanned release of hazardous waste from the Surface Impoundment(s)? (Sections 265.15 and 3745-55-15).	_____	_____	<u>X</u>	_____
5. Whenever Surface Impoundments are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the Surface Impoundment, the facility has insured the safety of such changes by one or both of the following methods (265.225 and 3745-57-06).	_____	_____	<u>X</u>	_____
a) A complete waste analysis plus bench scale or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	_____	_____	<u>X</u>	_____
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	_____	_____	<u>X</u>	_____
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in Surface Impoundments the facility has insured the safety of the operation by the following method (Sections 265.229 and 3745-57-10).	_____	_____	<u>X</u>	_____
a) The waste is treated immediately after placement in the Surface Impoundment so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	_____	_____	<u>X</u>	_____
7. Incompatible materials are never placed in the same Surface Impoundment unless it is done in compliance with the safety requirements of Section 265.17(b) (Sections 265.230 and 3745-57-11).	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
8. As required by Subpart F, Sections 265.90 and 3745-55-90 (Groundwater Monitoring) the facility has implemented a groundwater monitoring program capable of determining the impact of the Surface Impoundment(s) on the quality of the groundwater in the uppermost aquifer underlying the facility.	___	___	X	___
9. In lieu of a groundwater monitoring program, the operator has a written demonstration that there is a low potential for migration of hazardous waste or constituents via ground or surface waters which has been certified in writing by a qualified geologist in compliance with Sections 265.90(c) and 3745-55-90-C.	___	___	X	___
10. Upon closure of the Surface Impoundment, the operator intends to remove all wastes, residues, liners and any contaminated soil as required by Sections 265.228 and 3745-57-09 in order to exempt the Surface Impoundment from further regulation under Section 265.	___	___	X	___

NOTE: IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUNDWATER MONITORING REQUIREMENTS SPECIFIED IN SUBPART G FOR DISPOSAL FACILITIES AND SUBPART N, SECTION 265.310 FOR LANDFILLS. (SECTIONS 265.228 AND 3745-57-09).

Subpart L: Storage in Waste Piles

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal (Sections 265.251 and 3745-57-31).	___	___	X	___
2. If leachate or runoff from a Waste Pile would be a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation (Sections 265.253 and 3745-57-33).	___	___	X	___
a) The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste.	___	___	X	___

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff.	_____	_____	<u>X</u>	_____
c) No liquids or wastes containing free liquids are placed in the pile.	_____	_____	<u>X</u>	_____
3. No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record (Sections 265.252 and 3745-57-32).	_____	_____	<u>X</u>	_____
4. Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met (Sections 265.256 and 3745-57-36).	_____	_____	<u>X</u>	_____
a) The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive and was done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	_____	_____	<u>X</u>	_____
b) The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.	_____	_____	<u>X</u>	_____
5. Incompatible materials are never placed in the same Waste Pile or near areas containing residues of a incompatible material unless it is done in compliance with the safety requirements of Section 265.17(b) (Sections 265.257(a)(c) and 3745-57-37-A-C).	_____	_____	<u>X</u>	_____
6. Piles of hazardous waste are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.257(b) and 3745-57-37-B).	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

Subpart M: Land Treatment

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Is treated hazardous waste capable of biological or chemical degradation?	_____	_____	<u>X</u>	_____
2. Are run-off and run-on diverted from the facility or collected? (Effective Date: November 19, 1981)?	_____	_____	<u>X</u>	_____
3. Is waste analyzed according to 265.273?	_____	_____	<u>X</u>	_____
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	_____	_____	<u>X</u>	_____
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?	_____	_____	<u>X</u>	_____
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	_____	_____	<u>X</u>	_____
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?	_____	_____	<u>X</u>	_____
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)	_____	_____	<u>X</u>	_____
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies).	_____	_____	<u>X</u>	_____

Subpart N: Landfills

1. General Operating Requirements. Does the facility provide the following:

NOTE: 1a, 1b AND 1c ARE EFFECTIVE ON NOVEMBER 19, 1981.

a) Diversion of run-on away from active portions of the fill?

_____	_____	<u>X</u>	_____
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RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Collection of run-off from active portions of the fill?	___	___	<u>X</u>	_____
c) Is collected run off treated?	___	___	<u>X</u>	_____
d) Control of wind dispersal of hazardous waste?	___	___	<u>X</u>	_____
2. Surveying and Recordkeeping. Does the operating record include:				
a) A map showing the exact location and dimensions of each cell?	___	___	<u>X</u>	_____
b) The contents of each cell and the location of each hazardous waste type within each cell?	___	___	<u>X</u>	_____
3. Closure and Post-Closure				
a) Is the Closure Plan available for inspection by May 19, 1981?	___	___	<u>X</u>	_____
b) Has this plan been submitted to the Regional Administrator?	___	___	<u>X</u>	_____
c) Has Closure begun?	___	___	<u>X</u>	_____
d) Is Closure cost estimate available by May 19, 1981?	___	___	<u>X</u>	_____
4. Special requirements for ignitable or reactive waste				
a) Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?	___	___	<u>X</u>	_____

NOTE: IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE SEE TREATMENT REQUIREMENTS . IF NOT, THE PROVISIONS OF 40 CFR 265.17(b) APPLY.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5) Special Requirements for Incompatible Wastes.				
a) Does the owner or operator dispose of incompatible wastes in separate cells? If not, the provisions of 40 CFR 265.17(b) apply.	___	___	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. Special requirements for liquid waste (effective November 19, 1981)				
a) Are bulk or non-containerized liquids placed in the landfill?	_____	_____	X	_____
b) Does the landfill have a chemically and physically resistant liner system?	_____	_____	X	_____
c) Does the landfill have a functional leachate collection system?	_____	_____	X	_____
d) Are free liquids stabilized prior to or immediately after placement in the landfill?	_____	_____	X	_____
7. Special requirements for Containers (effective November 19, 1981)				
a) Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	_____	_____	X	_____

Subparts O and P: Incineration and Thermal Treatment

1. Determination of Steady State

- a) Type of unit (i.e., type of incinerator or thermal treatment): _____

- b) Components and steady state condition:

NOTE: INDICATE WHETHER OR NOT THIS COMPONENT WAS AT STEADY STATE PRIOR TO ADDING WASTE.

	<u>Component</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1.	_____	_____	_____	X	_____
2.	_____	_____	_____	X	_____
3.	_____	_____	_____	X	_____
4.	_____	_____	_____	X	_____

RCRA INTERIM STATUS INSPECTION FORM

2. Waste Analysis

NOTE: THE FOLLOWING ARE MINIMUM REQUIREMENTS, FOR WASTES NOT PREVIOUSLY BURNED/TREATED:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Required analyses; has an analysis been performed for the heating value?	___	___	<u>X</u>	___
b) Halogen content?	___	___	<u>X</u>	___
c) Sulfur content?	___	___	<u>X</u>	___
d) Has documented or written data been substituted for analysis of either:				
1. Lead?	___	___	<u>X</u>	___
2. Mercury?	___	___	<u>X</u>	___
e) List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)				

	<u>Remark #</u>
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____
6. _____	_____
7. _____	_____

RCRA INTERIM STATUS INSPECTION FORM

3. Monitoring and Inspections

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Are combustion/emission control instruments monitored at least every 15 minutes?	_____	_____	<u>X</u>	_____
b) Is steady state maintained or corrections attempted?	_____	_____	<u>X</u>	_____
c) Is tack plume observed at least hourly for normal color and opacity?	_____	_____	<u>X</u>	_____
d) Did any stack observations made by owner or operator show a plume different than normal?	_____	_____	<u>X</u>	_____
e) If yes to "d" above, were corrections made to return emissions to normal appearance?	_____	_____	<u>X</u>	_____

NOTE: SPECIFY IN REMARKS FOR WHAT PERIOD OF TIME THIS WAS CHECKED.

f) Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	_____	_____	<u>X</u>	_____
g) Are emergency shutdown controls and system alarms checked daily for proper operation?	_____	_____	<u>X</u>	_____

4. Open Burning

NOTE: ONLY COMPLETE THIS PART IF THE FACILITY OPEN BURNS HAZARDOUS WASTE.

a) Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	_____	_____	<u>X</u>	_____
b) If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft.
101 to 1,000.....	380 m	1,250 ft.
1,001 to 10,000.....	530 m	1,730 ft.
10,001 to 30,000.....	690 m	2,260 ft.

Subpart Q: Chemical, Physical and Biological Treatment

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	___	___	<u>X</u>	___
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	___	___	<u>X</u>	___
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	<u>X</u>	___
4. Are inspection procedures followed according to 265.403?	___	___	<u>X</u>	___
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	<u>X</u>	___
6. Are incompatible waste treated? (If yes, 265.17(b) applies.)	___	___	<u>X</u>	___

NOTE: EPA HAS TEMPORARILY SUSPENDED THE APPLICABILITY OF THE REQUIREMENTS OF THE HAZARDOUS WASTE REGULATIONS IN 40 CFR PARTS 122, 264 AND 265 TO OWNERS AND OPERATORS OF (1) WASTEWATER TREATMENT TANKS THAT RECEIVE, STORE, AND TREAT WASTEWATERS THAT ARE HAZARDOUS WASTE OR THAT GENERATE, STORE OR TREAT A WASTEWATER TREATMENT SLUDGE WHICH IS A HAZARDOUS WASTE WHERE SUCH WASTEWATERS ARE SUBJECT TO REGULATION UNDER SECTIONS 402 OR 307(b) OF THE CLEAN WATER ACT (33 U.S.C. 1251 ET SEQ.) AND (2) NEUTRALIZATION TANKS, TRANSPORT VEHICLES, VESSELS, OR CONTAINERS WHICH NEUTRALIZE WASTES WHICH ARE HAZARDOUS ONLY BECAUSE THEY EXHIBIT THE CORROSIVITY CHARACTERISTIC UNDER 40 CFR 261.22 OR ARE LISTED AS HAZARDOUS WASTES IN SUBPART D OF 40 CFR PART 261 ONLY FOR THIS REASON.

RCRA INTERIM STATUS INSPECTION FORM

REMARKS, PART 5, (TREATMENT/STORAGE/DISPOSAL)



Re: Application Number 81-HW-0040
Pickaway County

August 26, 1981

R. F. Seip, Plant Manager
Reynolds Metals Company
Building Products Plant
P.O. Box 12
Ashville, Ohio 43103

Dear Mr. Seip:

On August 13, 1981, Debra Unger-Rice of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by Mr. Paul Goliver.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

A handwritten signature in cursive script that reads "Paul Flanigan".

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V
Debra Unger-Rice, CDO

CERTIFIED MAIL

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

FACILITY NO. - 81-HW-0040
 OWNER - Reynolds Metals
 FACILITY NAME - Reynolds Aluminum Building Products
 FACILITY LOCATION - P.O. Box 12 Reynolds Road Ashville, Ohio
 FACILITY CONTACT - R. F. Seip Plant Manager
 ISS INSPECTION DATE - Aug 13, 1981
 PHONE NO. - 614/983-2571

Page	COLUMN I Item No.	COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
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	B 1	3745-55-13	265.13			
		2	3745-55-13	265.13		
		3	"	"		
	C 1	3745-55-14	265.14			
		2	"	"		
		3	"	"		
		4	"	"		
	D 1	3745-55-15	265.15			
		2	"	"		
		3	"	"		
4	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	"	"			
	E 1	3745-55-16	265.16	B		
		2	"	"	B	
		3	"	"	B	
		4	"	"	B	
		5	"	"	B	
		6	"	"	B	
	F 1	3745-55-17	265.17			
2		"	"			
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5	IV A 1	3745-55-31	265.31			
		B 1	3745-55-32	265.32		
	2	"	"			
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	C 1	3745-55-33	265.33			
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D 1	3745-55-34	265.34				
6	E	3795-55-35	265.35			
	V A 1	3745-55-52	265.52			

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7	B 1	3745-55-53	265.53	C		
	C 1	3745-55-55	265.55			
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	D 1	3745-55-56	265.56			
VI	A 1	3745-55-71	265.71			
	2	"	"			
	B 1	3745-55-72	265.72			
8	C 1	3745-55-73	265.73			
	2b	"	"			
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	g	"	"			
9	VII A 1	3745-56-03	265.112			
	2	"	"			
	3	"	"			
	4	3745-56-32	265.142	B	✓	
	B 1	3745-56-09	265.118			
VIII	I 1	3745-56-51	265.171			
	2	3745-56-52	265.172			
	3	3745-56-53	265.173			
	4	"	"			
	5	3745-56-54	265.174			
	6	3745-56-56	265.176			
10	7	3745-56-57	265.177			
	8	"	"			
	J 1	3745-56-72	265.192			
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	4	3745-56-73	265.193			
	5	3745-56-74	265.194			
	6	3745-56-78	265.198			
	7	3745-56-79	265.199			
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	2	3745-57-04	265.223			
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e	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use	
12	L	1	3745-57-31	265.251			
		2	3745-57-32	265.252			
		3		265.258			
		4	3745-57-36	265.256			
		5	"	"			
		6	3745-57-37	265.257			
		7	3745-57-37	265.257			
13	M	1	3745-57-52	265.272			
		2	"	"			
		3	3745-57-53	265.273			
		4	3745-57-56	265.276			
		5	3745-57-58	265.278			
		6	3745-57-58	265.278			
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14	N	A	1	3745-57-72	265.302		
			2	"	"		
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	B	1	3745-57-79	265.309			
		2	"	"			
	C	1	3745-56-03	265.112			
		2	"	"			
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		4	3745-56-32	265.192			
	15	D	1	3745-57-82	265.312		
				3745-55-17	265.17(b)		
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F		1	3745-57-84	265.314			
		2	"	"			
		3	"	"			
		4	"	"			
16	O&P	G	1	3745-57-85	265.315		
		I	B	1	3745-58-33	265.373	
	2	"		"			
	3	"		"			
	4	"		"			
	5	"		"			
	II	A	1a	3745-58-35	265.375		
			b	"	"		
			c	"	"		
	17		2a	3745-58-35	265.375		
b			"	"			
B		1	"	"			
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	G 1	"	"			
18	IV A 1	3745-58-42	265.382			
	2	"	"			
	Q 1	3745-58-51	265.401			
	2	"	"			
19	3	3745-58-52	265.402			
	4	3745-58-53	265.403			
	5	3745-58-55	265.405			
	6	3745-58-56	265.406			
	IX I (A)	3745-52-40	262.40			
	(B) 1	3745-52-21	262.21			
	2	"	"			
20	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	(C) 8	3745-52-42	262.42			
	2 (A)	3745-52-30	262.30			
	(B)	3745-52-31	262.31			
	(C)	3745-52-33	262.33			
21	3 1	3745-52-34	262.34			
	2	"	"			
	3	3745-56-54	265.174			
	4a	3745-56-72	265.192			
	b	"	"			
	c	"	"			
	d	3745-56-74	265.184			
	e	3745-56-78	265.198			
	f	3745-56-79	265.199			
22	VI A	3745-52-40	262.40			
	B	3745-52-41	262.41			
	VII 1a	3745-52-50	262.50			
	b	"	"			
	c	"	"			
	2	"	"			
23	X I	3745-53-22	263.22			
	II A	3745-53-20	263.20			
	B	"	"			
	V A	3745-53-10	263.10			
	B	3745-53-10	"			

KEY TO CODED ITEMS (COLUMN IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 30 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.

STATE IDENTIFICATION NUMBER

87-HM 0040
0205

EPA IDENTIFICATION NUMBER

OH D055352512

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

- (A) Facility Name: REYNOLDS ALUMINUM BUILDING PRODUCTS
(B) Street: P.O. Box 12 REYNOLDS ROAD
(C) City: ASHVILLE (D) State: OHIO (E) Zip Code: 43103
(F) Phone: 614-983-2571 (G) County: PICKAWAY
(H) Operator: REYNOLDS ALUMINUM BUILDING PRODUCTS
(I) Street: P.O. Box 12 REYNOLDS ROAD
(J) City: RICHMOND (K) State: VIRGINIA (L) Zip Code: _____
(M) Phone: _____ (N) County: _____
(O) Owner: REYNOLDS METALS
(P) Street: 6601 WEST BROAD STREET P.O. Box 27003
(Q) City: RICHMOND (R) State: VIRGINIA (S) Zip Code: _____
(T) Phone: 804-281-2000 (U) County: _____
(V) Date of Inspection: 8/13/81 (W) Time of Inspection (From) 10:00AM (To) 12:00PM
(X) Weather Conditions: HUMID, HAZY, 80°

(Y) Person(s) Interviewed	Title	Telephone
<u>Mr. Paul Gulwan</u>	<u>Mech. Engineer</u>	<u>614-983-2571</u>
_____	_____	_____
_____	_____	_____
(Z) Inspection Participants	Agency/Title	Telephone
<u>Mrs Debra Unger-Rice</u>	<u>OHIO EPA/E. Sci.</u>	<u>614-466-6450</u>
_____	_____	_____
_____	_____	_____
(AA) Preparer Information		
Name	Agency/Title	Telephone
<u>Mrs Debra Unger-Rice</u>	<u>OHIO EPA/E. Sci.</u>	<u>614-466-6450</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|---|---|
| <input checked="" type="checkbox"/> A. Storage and/or Treatment | <input type="checkbox"/> D. Incineration and/or Thermal Treatment (O and P) |
| 1. Containers (I) | |
| 2. Tanks (J) | |
| 3. Surface Impoundments (K) | <input checked="" type="checkbox"/> E. Chemical, Physical, and Biological Treatment (Q) |
| 4. Waste Piles (L) | |
| <input type="checkbox"/> B. Land Treatment (M) | |
| <input type="checkbox"/> C. Landfills (N) | |

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	X	—	_____
2. Facility expansion?	—	X	—	_____
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X	—	—	<u>E. P. TOXIC TEST RECORDS</u>
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X	—	—	_____
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	X	—	—	_____
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X	—	—	<u>24 hr. GUARD</u>
2. Artificial or natural barrier around facility?	X	—	—	<u>FENCE</u>
3. Controlled entry?	X	—	—	<u>GUARD</u>
4. Danger sign(s) at entrance?	X	—	—	_____
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	X	—	—	<u>Insurance Company inspects</u>
2. Records of operator error?	X	—	—	<u>Plus Voluntary file men</u>
3. Records of discharges?	X	—	—	<u>Employed with RECORDS</u> <u>ALUMINUM</u>

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
 (E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
2. Job descriptions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
3. Description of training?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
4. Records of training?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
5. Have facility personnel received required training by 5-19-81?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
6. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
 (F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
2. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes	No	NI*	Remarks
—	X	—	_____

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?

X	—	—	<u>HORN ALARMS ALARM ON SPRINKLER SYSTEM - HONEYWELL</u>
---	---	---	--

2. Telephone or 2-way radios at the scene of operations?

X	—	—	<u>TELEPHONE, PLUS GUARD WATCHES</u>
---	---	---	--------------------------------------

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X	—	—	<u>CO₂ SYSTEM IN CONTAINER AREA</u>
---	---	---	--

Indicate the volume of water and/or foam available for fire control:

Sprinkler System, 300,000 gal Water Tank to use for fire, CO₂ system in container room

(C) Testing and Maintenance of Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?

X	—	—	<u>INSURANCE COMPANY DOES THIS</u>
---	---	---	------------------------------------

2. Is emergency equipment maintained in operable conditions?

X	—	—	<u>INSURANCE INSPECTS</u>
---	---	---	---------------------------

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

X	—	—	_____
---	---	---	-------

(E) Is there adequate aisle space for unobstructed movement?

X — — DRUMS ARE STACKED A BIT TOO HIGH

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

X — —

2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X — —

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X — —

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

X — —

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

X — —

NO WRITTEN PLAN EMPLOYEES KNOW FROM VERBAL INSTRUCTION

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>WILL SEND OUT</u>
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>THE GUARD & Mr. Gullivan</u>
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>_____</u>
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>_____</u>
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>NO EMERGENCIES YET</u>

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>_____</u>
2. Are records of past shipments retained for 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>_____</u>
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>INTEND TO</u>

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

X _____

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

X _____

c. The location and quantity of each hazardous waste within the facility?

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X _____ DONE WEEKLY

f. Reports detailing all incidents that required implementation of the Contingency Plan?

_____ X _____ INTEND TO

g. All closure and post closure costs as applicable? (Effective 5-19-81)

X _____

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Has this plan been submitted to the Regional Administrator	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Is closure estimate available by May 19, 1981?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>only small financial statements in the closure plan - The corporate people have the financial details. Mr. Gullian intends to get a copy of the details.</i>
3) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>ONE PERSON IN CHARGE of CONTAINER AREA</i>
2. Are containers compatible with waste in them?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers managed to prevent leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>ignitable</i>

Yes No NI* Remarks

7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)

--- -- X N/A

8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

--- -- X N/A

J
TANKS N/A

Facility Name: _____

Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?

--- -- --

2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

--- -- --

3. Do continuous feed systems have a waste-feed cutoff?

--- -- --

4. Are waste analyses done before the tanks are used to store a substantially different waste than before?

--- -- --

5. Are required daily and weekly inspections done?

--- -- --

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

--- -- --

7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)

--- -- --

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

N/A

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: Reynolds Aluminum Building
Product

Date of Inspection: 8/13/81

- | | | |
|--|----------|---|
| 1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? | <u>X</u> | <u>Made of Concrete Block</u> |
| 2. Do earthen dikes have protective covers? | <u>X</u> | <u>Concrete dike</u> |
| 3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? | <u>X</u> | _____ |
| 4. Is the freeboard level inspected at least daily? | <u>X</u> | _____ |
| 5. Are the dikes inspected weekly for evidence of leaks or deterioration? | <u>X</u> | <u>Daily inspection</u> |
| 6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) | <u>X</u> | <u>Lagoon hold + TREAT</u>
<u>CHROMIUM</u> |
| 7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) | <u>X</u> | <u>N/A</u> |

L
WASTE PILES *NI*

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	-----
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	-----
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	-----
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	-----
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	-----

*Not Inspected

LAND TREATMENT

N/A

Facility Name: _____

Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation?

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?

3. Is waste analyzed according to 265.273?

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements				
Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	---	---	---	-----
**2. Collection of run-off from active portions of the fill?	---	---	---	-----
**3. Is collected run off treated?	---	---	---	-----
4. Control of wind dispersal of hazardous waste?	---	---	---	-----
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping				
Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	---	---	---	-----
2. The contents of each cell and the location of each hazardous waste type withing each cell?	---	---	---	-----
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	---	---	---	-----
2. Has this plan been submitted to the Regional Administrator?	---	---	---	-----
3. Has closure begun?	---	---	---	-----
4. Is closure cost estimate available by 5-19-81?	---	---	---	-----
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?				
	---	---	---	-----

N/A

Yes No NI* Remarks

(If waste is rendered non-reactive or non-ignitable see treatment requirements)

If not, the provisions of 40 CFR 265.17(b) apply.

;) Special Requirements for Incompatible Wastes.

Does the owner or operator dispose of incompatible wastes in separate cells?

If not, the provisions of 40 CFR 265.17(b) apply.

) Special requirements for liquid waste (effective 11-19-81)

1. Are bulk or non-containerized liquids placed in the landfill?

2. Does the landfill have a chemically and physically resistant liner system?

3. Does the landfill have a functional leachate collection system?

4. Are free liquids stabilized prior to or immediately after placement in the landfill?

) Special requirements for Containers (effective 11-19-81)

Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?

N/A

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

*Not Inspected

Yes No NI* Remarks

2. Has documented or written data been substituted for analysis of either:

a. Lead?

b. Mercury?

3. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

Remarks

1. _____

2. _____

3. _____

4. _____

5. _____

N/A

III. Monitoring and Inspections

Yes No NI* Remarks

1. Are combustion/emission control instruments monitored at least every 15 minutes?

2. Is steady state maintained or corrections attempted?

3. Is stack plume observed at least hourly for normal color and opacity?

4. Did any stack observations made by owner or operator show a plume different than normal? **

5. If yes to D above, were corrections made to return emissions to normal appearance? **

6. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?

7. Are emergency shutdown controls and system alarms checked daily for proper operation?

*Not Inspected

Specify in Remarks for what period of time this was checked.

IV. Open burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	_____	_____	_____	_____
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	_____	_____	_____	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	X	_____	_____	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	X	_____	_____	_____

*Not Inspected

	Yes	No	NI*	Remarks
Has the owner or operator addressed the waste analysis requirements of 265.402?	X	—	—	_____
4. Are inspection procedures followed according to 265.403?	X	—	—	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	—	—	X	<i>None, only Chromium</i>
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	—	X	—	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	X	—	—	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	X	—	—	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	X	—	—	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<u>X</u>	___	___	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>X</u>	___	___	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	___	___	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	___	___	_____
7. Required certification?	<u>X</u>	___	___	_____
8. Required signatures?	<u>X</u>	___	___	_____
(C) Does the owner or operator submit exception reports when needed?	___	___	<u>X</u>	<u>HAVEN'T NEEDED TODAY</u>

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<u>X</u>	___	___	_____
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<u>X</u>	___	___	_____
(C) If required, are placards available to transporters of hazardous waste?	<u>X</u>	___	___	_____

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line)?	_____	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?)	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>INTEND TO</u>
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>INTEND TO</u>

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste? _____

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:
 - a. Notified the Administrator in writing? _____
 - b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? _____
 - c. Met the Manifest requirements? _____
2. Importing Hazardous Waste, has the generator:
 - Met the manifest requirements? _____

*Not Inspected

X
 TRANSPORTER REQUIREMENTS *N/A*
 40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
 (Subpart B)

Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?

- Yes No NI* Remarks

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?

B. Are signed completed manifest(s) on file?

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?

B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

① This facility stores paint waste in containers. E.P. Toxic tests were performed on the paint sludge and lead was found to be ~~higher~~ ^(DOOS) E.P. Toxic.

② I feel this facility is a treatment facility. They treat chromium, change it from hexavalent to trivalent using lime. This sludge is F019 - chemical conversion coating of aluminum - a listed waste. This treated chromium is then stored in lagoons - surface impoundment. They are not a disposal facility because they plan to clear out their lagoons upon closure.

③ F017 should not be one of their waste listings on their application form. Only F019 & D008

RCRA Inspection Report

EPA Identification Number OH D055352512

HWFAB Permit Number (if appropriate) 01-65-0040

Facility Name Reynolds Aluminum Building Products

Location P.O. Box 12
Ashville, Ohio 43103

Person(s) Interviewed	Title	Telephone
<u>Mr. Charles Bent</u>	<u>Environmental Engineer</u>	
<u>Mr. Bud Munson</u>	<u>Maintenance Supervisor</u>	
Inspector(s)	Agency/Title	Telephone
<u>Mr. Ken Humphrey</u>	Ohio EPA <u>Hazardous Waste Scientist</u>	<u>614-4626348</u>
<u>Ms. Debbie Unger</u>	Ohio EPA <u>Environmental Scientist</u>	<u>614-466-6450</u>
	Ohio EPA _____	_____

Installation Activity

Mark One	If the site is a TSDF, check the boxes indicating which forms were used -
<input type="checkbox"/> Generator only (G)	<input checked="" type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting
<input type="checkbox"/> Transporter only (T)	<input type="checkbox"/> Groundwater Monitoring
<input type="checkbox"/> TSDF only	<input checked="" type="checkbox"/> Closure and Post-Closure
<input type="checkbox"/> G-T	<input checked="" type="checkbox"/> Financial Requirements
<input checked="" type="checkbox"/> G-TSDF	<input checked="" type="checkbox"/> Containers S01
<input type="checkbox"/> T-TSDF	<input type="checkbox"/> Tanks S02/T01
<input type="checkbox"/> G-T-TSDF	<input type="checkbox"/> Surface Impoundments S04/T02
<input type="checkbox"/> Waste Piles S03	<input type="checkbox"/> Incineration/Thermal Treatment T03
<input type="checkbox"/> Land Treatment D81	<input type="checkbox"/> Chemical/Physical/Biological T04
<input type="checkbox"/> Landfills D80	

**D. Corrective
Action**

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**REYNOLDS METALS COMPANY
ASHVILLE, OHIO
OHD 055 352 512**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 055 352 512
Date Prepared	:	February 5, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH18
Prepared by	:	PRC Environmental Management, Inc. (Kimberly Jenkins/Peter Zelinkas)
Contractor Project Manager	:	Shin Ahn
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Attachment

- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C VISUAL SITE INSPECTION FIELD NOTES

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2	FACILITY LAYOUT	7

RELEASED 9/26/02
DATE _____
RIN # _____
INITIALS JLV

ENFORCEMENT
CONFIDENTIAL

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Reynolds Metals Company (Reynolds) facility in Ashville, Ohio. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The Reynolds facility occupies about 126 acres. Operations began in 1972 and have mainly involved aluminum metal working. The facility manufactures residential and light commercial exterior building products, including siding, shutters, and gutters.

Reynolds filed a Part A permit application in 1980 as a treatment, storage, or disposal (TSD) facility. In 1984, Reynolds withdrew the application and changed its status to a generator of hazardous waste with less than 90-day storage. The facility generates paint waste (D001, D035, F003), solvent waste (D040), nonhazardous waste oils, wastewater, and wastewater treatment sludge (F019). Most waste is shipped off site to Ross Incineration Services in Grafton, Ohio, for incineration. Wastewater treatment sludge is treated and disposed of at the Chemical Waste Management facility in Fort Wayne, Indiana.

Reynolds is surrounded by a 6-foot-high, chain-link fence topped with barbed wire. The main facility gate is operated from inside the Reynolds manufacturing building and is monitored 24 hours per day by surveillance cameras. The facility is located in a rural area; about 3,500 residents live within a 1-mile radius of the Reynolds facility.

The PA/VSI identified the following three SWMUs at the facility. No AOCs were identified.

Solid Waste Management Units

1. Waste Storage Area.
2. Wastewater Treatment Plant
3. Satellite Accumulation Areas

The potential for release to on-site soils and ground water is moderate. The Waste Storage Area (SWMU 1) is lacking sound containment devices and stressed vegetation was noted in the area. Ground water is used locally as a source of drinking water, and the nearest wells are about 600 feet southeast and downgradient from the facility. Drinking water for Ashville and the Reynolds facility is withdrawn from a well field located on the east side of Ashville about 2 miles southeast of Reynolds.

Reynolds has a high potential for releases to surface water. The facility has an National Pollutant Discharge Elimination System (NPDES) permit and has been cited for ongoing discharge violations. All facility wastewater flows directly to Reynolds wastewater treatment plant (WWTP) and is then discharged to Walnut Creek, just south of the facility. Walnut Creek empties into the Scioto River, which in turn empties into the Ohio River near Portsmouth, Ohio.

Reynolds has three air permits for a primer and finisher on a continuous coil-coating line and for a shutter-coating process. The potential for air contamination is low because Reynolds uses closed systems in its operations and has had no documented violations.

PRC recommends that soil samples be collected in the vicinity of the Waste Storage Area (SWMU 1) and analyzed for hazardous constituents. Adequate containment should be provided for hazardous waste at the facility. Because of ongoing NPDES violations, sediment samples should be collected in Walnut Creek near outfall 001. Samples should be analyzed for hazardous waste constituents.

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ENFORCEMENT
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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Reynolds Metals Company (Reynolds) facility in Ashville, Ohio. The PA was completed on July 10, 1991. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and from EPA Region 5 RCRA files. The VSI was conducted on July 11, 1991. It included interviews with facility representatives and a walk-through inspection of the facility. Three SWMUs and no AOCs were identified at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and seven inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

Reynolds occupies about 126 acres (at 39°43'45"N, 82°57'55"W) in the northwest corner of Pickaway County, Ohio, near Ashville. The facility is bordered by State Route 752 on the south, a C & O Railroad right-of-way on the east, and farmland on the north and west (see Figure 1). Reynolds is about 17 miles south of Columbus, Ohio.

2.2 FACILITY OPERATIONS

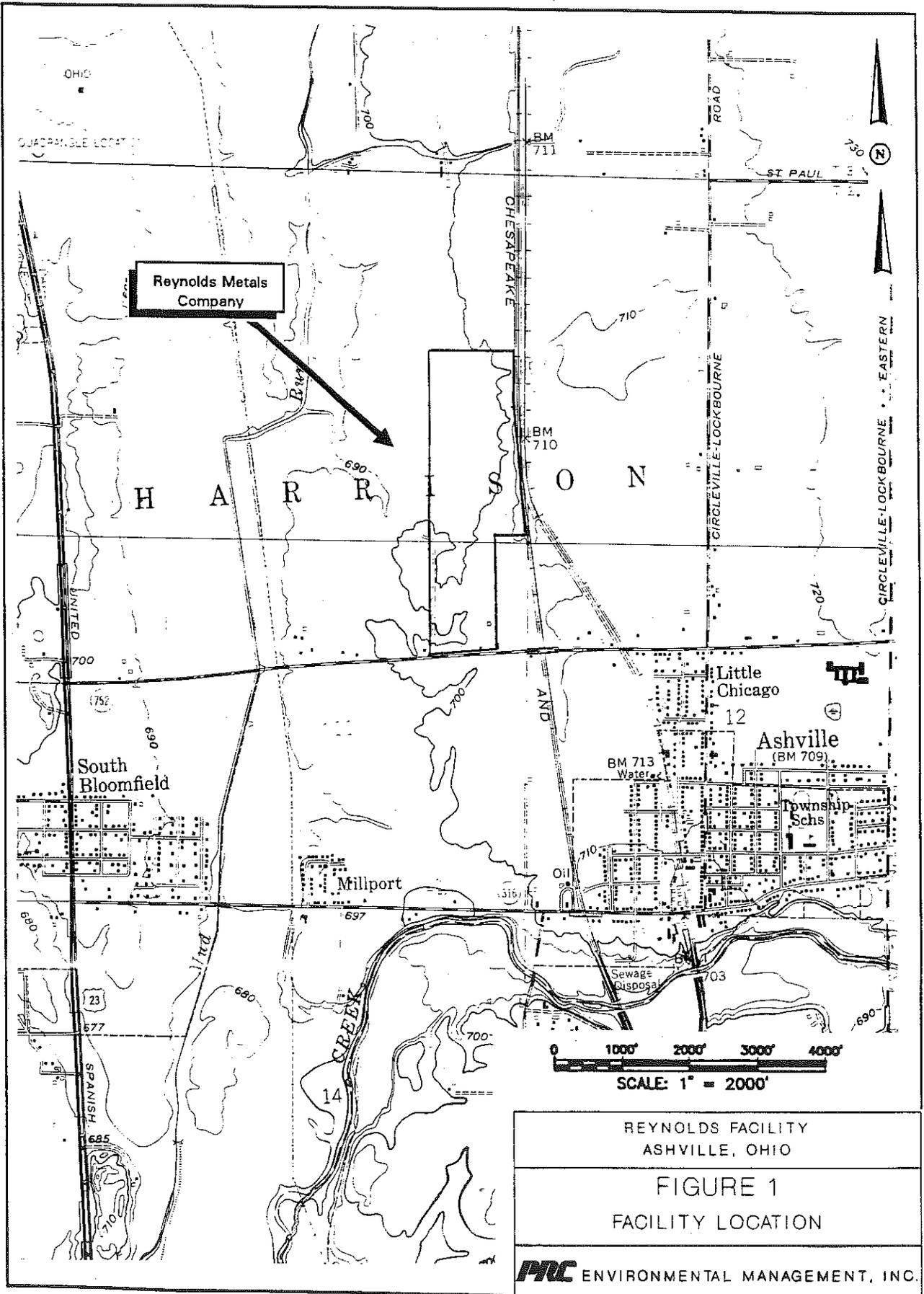
Reynolds began operations in 1972 and has had a number of expansions over the years. The facility has a minimum of 100 and a maximum of 150 employees working four shifts. Facility operations involve manufacturing of residential and light commercial exterior building products, including siding, shutters, and gutters. Facility operations are slowly changing from manufacturing aluminum products to manufacturing high-grade plastic and vinyl products such as shutters. Raw materials are formulated into various products through a number of presses, painted, and shipped from the facility in bulk.

Three SWMUs were identified during the PA/VSI: a Waste Storage Area, a Wastewater Treatment Plant, and Satellite Accumulation Areas (see Table 1 and Figure 2).

2.3 WASTE GENERATING PROCESSES

Reynolds generates paint wastes, waste solvents, waste oils, wastewater, and wastewater treatment sludge (see Table 2).

Aluminum enters the facility in rolls of sheeting. It is cleaned with a sodium hydroxide (NaOH) solution, conversion-coated with a chromium compound, and painted. The conversion-coating process allows paint to adhere to the aluminum. In 1987, Reynolds changed from spray-cleaning and conversion-coating the aluminum to using roll-coating processes. The spray-



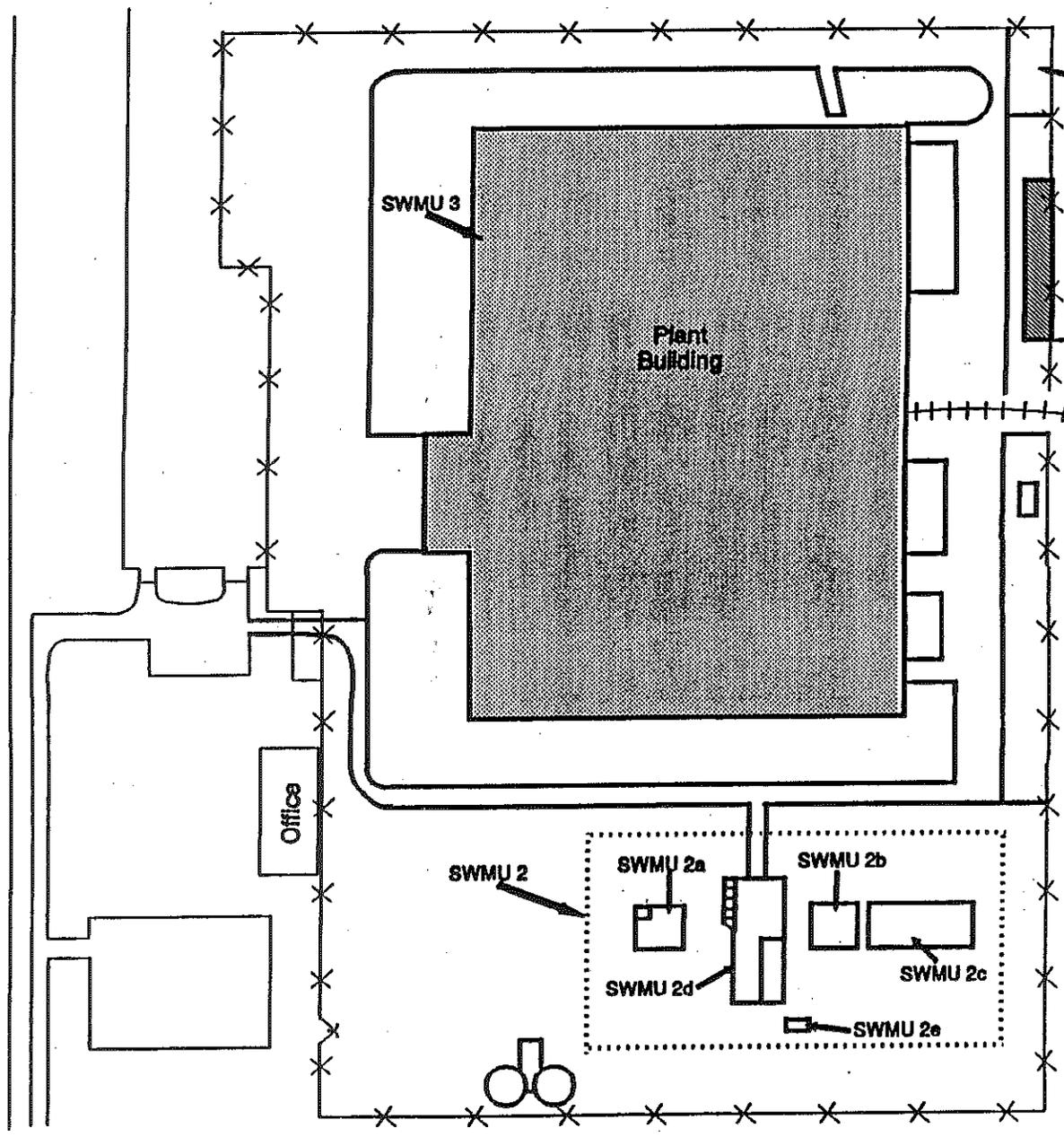
SOURCE: Modified from USGS 7-1/2 Minute Topographic Quadrangle Map, Ashville, Ohio, 1961

TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Waste Storage Area	Yes	Active (less than 90-day storage)
2	Wastewater Treatment Plant	No	Active
3	Satellite Accumulation Areas	No	Active

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.



SOLID WASTE MANAGEMENT UNITS

- SWMU 1 Waste Storage Area
- SWMU 2 Wastewater Treatment Plant
- SWMU 2a Final Retention Pond
- SWMU 2b Caustic Retention Pond
- SWMU 2c Chromium Retention Pond
- SWMU 2d Sludge Rolloff
- SWMU 2e Clarifier
- SWMU 3 Satellite Accumulation Areas -
(shaded area - various locations)

LEGEND:

- x-x-x- Fence
- + + + + Railroad

**REYNOLDS METAL COMPANY
ASHVILLE, OHIO**

**FIGURE 2
FACILITY LAYOUT**

PRC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: Modified from Reynolds Metals Company Blueprints, 1979.

SCALE 1" = 600'

TABLE 2**SOLID WASTES**

<u>Waste/EPA Waste Code</u>	<u>Source</u>	<u>Primary Management Unit</u>
Paint Waste/D001, D035, F003	Strip Paint Lines	1 and 3
Solvent Waste/D040	Shutter Painting	1 and 3
Waste Oils	Maintenance	1 and 3
Wastewater	Cleaning and Conversion-Coating	2
Wastewater Treatment Sludge/F019	Cleaning and Conversion Coating	2

cleaning system consisted of nozzles that sprayed NaOH solution and chromium compound on the aluminum as it moved through the cleaning and conversion-coating processes. Now the aluminum is roll-coated with NaOH solution and chromium compound as it is rolled through the cleaning and conversion process (Johnson, 1991a).

Paint waste (D001, D035, and F003) is generated from paint color changes and cleaning of roll-painting trays. Most paint waste is removed in a bulk truck; the rest is placed in 55-gallon drums in Satellite Accumulation Areas (SWMU 3) which are eventually moved to the Waste Storage Area (SWMU 1). Eighty-five percent of the paint waste removed is backwash (solvents and water used for cleaning) (Johnson, 1991a).

Solvent waste (D040) is generated when nitrogen foam shutters are sent through a trichloroethylene cleaning system (Johnson, 1991b). Paint wastes and solvent wastes are placed in 55-gallon drums in Satellite Accumulation Areas (SWMU 3) and, when full, the drums are transferred to the Waste Storage Area (SWMU 1). The paint wastes and solvent wastes are shipped to Ross Incineration Services, Inc. (Ross), in Grafton, Ohio for fuels blending or incineration depending on the value of the material.

Waste oils are generated by Reynolds from maintenance of machinery. Waste oils are collected in 55-gallon drums in Satellite Accumulation Areas (SWMU 3) and transferred to the Waste Storage Area (SWMU 1). The waste oils are eventually removed from the facility by bulk truck to any of a variety of recycling firms.

Wastewater is generated from coil-coating, extrusion-coating, conversion-coating, and other facility processes. All wastewater empties into a caustic retention pond south of the main building. The facility has a chromium wastewater retention pond that is not currently used. A large amount of chromium sludge was in the chromium pond at the time of the VSI and was being removed and treated. Reynolds no longer produces large amounts of chromium wastewater, so all wastewater can be directed to the caustic pond. Treatment of the wastewater is accomplished by precipitation through the addition of a polyelectrolyte flocculent. Solids are allowed to settle and the pH is adjusted before the effluent is discharged through a National Pollutant Discharge Elimination System (NPDES) outfall (001) to Walnut Creek. Sludge is directed to a filter press for dewatering. Reynolds generates about one 20-cubic-yard roll-off of F019 sludge every 6 weeks. The roll-off is located in the Wastewater Treatment Plant (SWMU 2). Chemical Waste

Management, Inc. (CWM), transports this waste to its facility in Fort Wayne, Indiana, for treatment and disposal.

All sanitary wastewater goes through a separate treatment process involving aeration, settling, and chlorination and is discharged through NPDES outfall 601. Wastewater exiting through outfall 601 is combined with pretreated industrial wastewater. The combined wastewater is discharged through outfall 001 to Walnut Creek.

2.4 RELEASE HISTORY

The only documented releases from Reynolds have been wastewater releases exceeding National Pollutant Discharge Elimination System (NPDES) permit limitations. Reynolds has occasionally violated all its parameters in the past, but releases have mainly involved total suspended solids (TSS) and biological oxygen demand (BOD) from outfall 001.

Reynolds has had recurring releases of suspended solids since the mid-1970s (Reynolds, 1976 and OEPA, 1986c). The last TSS violation occurred in August 1990; since that time, no other TSS violations have been documented (OEPA, 1990a). To help correct this problem, facility wastewater is given longer time to settle.

Reynolds began having problems involving BOD in the mid-1980s (OEPA, 1986c and OEPA, 1990b). To correct these problems, Reynolds constructed a cover for its final settling pond to prevent algae growth. In the early 1990s, Reynolds started performing its own BOD testing to ensure that the BOD level of its wastewater did not change after treatment (Johnson, 1991a). This testing also provided quick results to ensure proper treatment was applied to the wastewater.

In January 1991, because of repeated NPDES violations, OEPA conducted a series of water quality tests in Walnut Creek at outfall 001. These tests indicated that Reynolds' effluent was acutely toxic to Walnut Creek's small aquatic life (OEPA, 1991a). No followup to these tests has been documented. However, OEPA is considering followup testing.

2.5

REGULATORY HISTORY

In May 1971, the Ohio Department of Health (ODH) approved plans for construction of the Reynolds wastewater treatment plant (ODH, 1971). Reynolds began operations at the facility in 1972.

In August 1980, Reynolds filed a RCRA Notification of Hazardous Waste Activity. In November 1980, Reynolds filed a Part A permit application as a treatment, storage, and disposal (TSD) facility (OEPA, 1984), with storage in containers and surface impoundments. In 1982, Reynolds submitted a revised Part A permit application to EPA deleting surface impoundments because the units were part of the Wastewater Treatment Plant (SWMU 2) operations (Reynolds, 1982). In early 1984, Reynolds elected to withdraw the Part A permit application. In July 1984, Reynold's request for a change to generator status was approved by EPA (EPA, 1984).

Since operations began at Reynolds, no major RCRA violations have been documented. In the most recent inspection, OEPA cited Reynolds for violations including lack of required spill absorbent in certain areas, open waste containers, and a 55-gallon drum in the waste storage area that was patched with putty (OEPA, 1991b).

Reynolds has two NPDES outfalls (001 and 601) that have been in use since facility operations began. Out fall 601 is for discharges from the treatment of sanitary wastewater. Effluent from outfall 601 is combined with treated process wastewater and is discharged through outfall 110 to Walnut Creek. Reynolds was first granted an NPDES permit in 1973 (associated parameters were not listed in the OEPA wastewater file) (OEPA, 1974).

In June 1985, OEPA inspected Reynolds for proper NPDES testing procedures; samples of effluent were collected. OEPA noted several major problems involving improper flow measurement, wastewater sampling (refrigeration, preservation, and use of proper containers), and recording of data on monthly monitoring report forms. Reynolds had also failed to obtain a required written report from its testing lab regarding sample holding times, quality control and quality assurance, and test methods and procedures. During the 1985 inspection, OEPA also found that outfall 001 was leaking through cracks in the concrete retaining wall by the weir. Reynolds corrected the problem immediately (OEPA, 1985).

In January 1986, OEPA informed Reynolds that the company was not using appropriate sample containers and preservatives for its wastewater effluent testing. Reynolds was directed to start keeping strip chart recordings of its flow measurements and a log recording calibrations of its flow measuring device. OEPA also required Reynolds to take duplicate samples of its effluent periodically (OEPA, 1986b).

In a letter from OEPA dated February 1986, Reynolds was informed that its unattended operations of the WWTP in January 1986 was a violation of its NPDES permit. Also, the method Reynolds had used for testing for total chromium was not EPA-approved (OEPA, 1986a). A follow-up inspection in late March 1986, found similar problems (OEPA, 1986d).

A March 1986 NPDES permit authorized Reynolds to discharge treated wastewater under the following parameters (OEPA, 1986e):

Outfall 001

Flow
Oil and Grease
TSS
Total Chromium
Total Zinc
Total Aluminum
Total Cyanide
BOD
Ammonia
Hexavalent Chromium
Total Phosphorous
Fecal Coliform

Outfall 601

Flow
BOD
TSS
Residual Chlorine
Color
Odor
Turbidity

In April 1986, Reynolds appealed for modification of the hexavalent chromium limitations in its NPDES permit, indicating that they were too stringent (Reynolds, 1986). Reynolds won the appeal, and modifications were approved by OEPA in August 1986 (OEPA, 1986f).

As mentioned in Section 2.4, Reynolds has had wastewater discharge problems mainly involving TSS and BOD violations. Other problems have involved improper operation and testing procedures at the wastewater treatment plant (Reynolds, 1989; OEPA, 1990c and 1991c). In early 1991, OEPA performed water quality tests in Walnut Creek at the 001 outfall and found that Reynold's effluent was acutely toxic to small aquatic life. No further testing has been performed.

Reynolds has three air permits for a primer and finisher on a continuous coil-coating line and for a shutter-coating process. Reynolds uses closed systems in its operations and has had no documented violations.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Reynolds facility.

2.6.1 Climate

Pickaway County is cold in winter and uncomfortably warm in summer. Winter precipitation, frequently snow, accumulates enough moisture in most soils by spring to minimize drought during summer. In winter, the average temperature is 33 °F, and the average daily minimum temperature is 24 °F. The lowest temperature recorded was -17 °F on January 28, 1963. In summer, the average temperature is 73 °F, and the average daily maximum temperature is 85 °F. The highest recorded temperature was 103 °F on July 14, 1954. The average seasonal snowfall is 13 inches. The average relative humidity is 60 percent at midafternoon. Humidity is higher at night, and the average at dawn is about 80 percent. The prevailing wind is from the south-southwest. Average windspeed is highest in March at 11 miles per hour. Tornadoes and severe thunderstorms occur occasionally; however, these storms are generally local and of short duration. The average yearly rainfall in Pickaway County is 38.03 inches. Rainfall peaks in May at 4.16 inches; the least monthly rainfall is 2.05 inches in October. The 1-year, 24-hour maximum rainfall is 2.5 inches, and the annual net precipitation is 7.0 inches (USDA, 1980).

2.6.2 Flood Plain and Surface Water

The Reynolds facility is not located in a 100-year flood plain (National Flood Insurance Program, 1978). Mud Run Creek runs about 1,750 feet to the west of Reynolds and empties into Walnut Creek, which is about 3,600 feet south of Reynolds. Walnut Creek empties into the Scioto River, which is west of Reynolds, and the Scioto River empties into the Ohio River near Portsmouth, Ohio. No municipal drinking water intakes are located on the Scioto River south of Walnut Creek. These bodies of water are used for industry, agriculture, recreational activities, and they provide a habitat for area wildlife.

A drainage ditch lies about 10 feet east of the waste storage area. During the VSI, the drainage ditch was dry and appeared to be is mainly for stormwater runoff

2.6.3 Geology and Soils

Pickaway County is made up of bedrock from the Devonian and Mississippian Ages. Bedrock in the vicinity of Reynolds is composed of thick-bedded Devonian limestones, that lie at a depth of about 150 feet (ODNR, 1943).

The community of Ashville lies on a glaciated plain at an elevation of about 710 feet. Pleistocene glaciers (Illinoisan and Wisconsinan) covered the area and left a thick coating of glacial drift.

Glacial deposits beneath the facility can be divided into the following units (ODNR, 1991):

- 0 to 10 feet - yellow clay
- 10 to 28 feet - yellow clay and gravel
- 28 to 32 feet - sand and gravel
- 32 to 48 feet - gravel and clay
- 48 to 51 feet - gravel
- 51 to 89 feet - sand and gravel

Soils in the area are comprised of the Crosby-Kokomo association. The soils are somewhat poorly drained, formed from medium textured glacial till (USDA, 1980).

2.6.4 Ground Water

Ashville is located along the line of the deep stage of the ancient Newark River with a floor level of about 510 feet and a fill of some 140 feet. The sand and gravel layers in the glacial deposits yield excellent water supplies (ODNR, 1943).

The ground-water table in the vicinity of the Reynolds facility ranges from 15 feet below ground surface to the west of Reynolds to 28 feet below ground surface to the east of Reynolds. Ground-water flow is primarily from north to south. Ground water in the vicinity is used as a primary source of drinking water, and is also used for agriculture. The closest ground-water wells are about 600 feet southeast of Reynolds, downgradient from the facility (ODNR, 1991).

Drinking water for Ashville and the Reynolds facility comes from well fields located on the east side of Ashville about 2 miles southeast of Reynolds.

2.7 RECEPTORS

The Reynolds facility is located in a rural area of Harrison Township in Pickaway County. The facility has about 30 employees. A number of villages lie within a 1-mile radius of Reynolds; they have a total population of about 3,500 residents. The nearest school is about 1 mile southeast of the facility. Ground water is the primary source of drinking water in the area, and as mentioned in Section 2.6.4, a number of wells are located about 600 feet downgradient from the facility.

Walnut Creek is an environmental receptor because Reynolds' treated wastewater effluent leaves the facility via this route. Releases in excess of Reynolds' NPDES permit limitations could affect wildlife and vegetation in the area of Walnut Creek and possibly the Scioto River. There are no sensitive environments in the vicinity of Reynolds.

Reynolds is surrounded by a 6-foot-high chain-link fence topped with barbed wire. The main gate is monitored 24 hours per day by a surveillance camera (Johnson, 1991a).

The main receptors for any facility releases are on-site employees. Everyday operations could expose them to contaminated air and hazardous materials.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the three SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and PRC observations.

SWMU 1

Waste Storage Area

Unit Description: The less than 90-day waste storage area is located on the northeast side of the Reynolds manufacturing building. This outdoor area has an unbermed, uncovered, asphalt pad. It stores empty drums, drums filled with hazardous waste, and drums filled with nonhazardous waste (see Photograph Nos. 1 and 2).

Date of Startup: This unit started operating in 1972.

Date of Closure: This unit is currently operational. A closure plan for the area was unavailable at the time of the file review.

Wastes Managed: All full drums of hazardous paint wastes and solvents are stored at this location until they are removed for disposal. The area also houses waste oils.

Release Controls: The area has an uncovered, unbermed, asphalt pad.

History of Release: No releases from this unit have been documented.

Observations: During the VSI, about 100 55-gallon drums of waste were in the unit and the asphalt surface was worn and stained. Nearby vegetation was stressed, although PRC could not determine whether this was caused by releases from the unit (see Photograph No. 3). No stained soil was noted.

Unit Description:

The WWTP is located on the south side of the Reynolds manufacturing building. Wastewater generated from the chemical conversion of aluminum is directed to a caustic retention pond. Two retention ponds have been used by Reynolds - a chromium wastewater retention pond and a caustic wastewater retention pond. The chromium retention pond measures 60 feet by 100 feet and has a capacity of about 250,000 gallons (see Photograph Nos. 4 and 5). The caustic retention pond measures 60 feet by 60 feet and has a capacity of about 150,000 gallons (see Photograph No. 6). Each pond is made of cinder blocks resting on a concrete base. Both contain a reinforced hypolene liner. The chromium retention pond is no longer used, although it contains waste sludge. It is equipped with a drainage grid under the liner which is used for leak detection. Reynolds wants to close the pond and plans to remove the sludge once closure is approved. A closure plan has not been submitted for the pond.

From the caustic pond, wastewater flows to a pH adjustment unit where sulfuric acid or a lime slurry is added to control pH. A flocculent is then added to the wastewater to cause precipitation. Wastewater then flows to a clarifier, allowing solid material to settle. The solids are then removed to a filter press for partial removal of water. Chromium conversion sludge (F019) is then removed from the filter press and is accumulated in a roll-off container. The pH of the final effluent is adjusted if necessary, and the treated wastewater is discharged from the facility.

Reynolds also operates a sanitary wastewater treatment system. Sanitary wastewater is treated by chemical addition and aeration. Treated wastewater flows to a final retention pond before discharged from the facility. The final retention pond for sanitary wastewater measures 30 feet by 30 feet and has a capacity of about 25,000 gallons (see Photograph No. 7). It is constructed of cinder

blocks resting on a concrete pad. The pond is lined with a sealant and is kept covered to prevent algae growth.

Date of Startup: The unit started operating in 1972.

Date of Closure: The unit is currently operational.

Wastes Managed: The unit receives caustic wastewater and sanitary wastewater. A chromium conversion sludge (F019) is generated in the unit.

Release Controls: The ponds are made of concrete and cinder blocks and are lined. The chromium pond has a drainage grid under its liner to allow detection of leaks. The tanks are inspected daily by Reynolds personnel.

History of Release: Throughout the 1980's, Reynolds had limited problems with pH and TSS and BOD limits.

Observations: At the time of the VSI, the chromium pond liner had a large tear and was being repaired. Reynolds informed PRC that repairs had begun on the liner 24 hours after discovery of the tear.

SWMU 3 **Satellite Accumulation Areas**

Unit Description: Reynolds uses 55-gallon, steel drums for satellite accumulation throughout the facility. The locations of the drums vary depending on operations. When full, the drums are transferred to the Waste Storage Area (SWMU 1) until removed from the facility.

Date of Startup: Satellite accumulation areas have been used since the early 1980s.

Date of Closure: The units are currently operational.

Wastes Managed: Paint wastes, solvent wastes, and waste oils are accumulated in the areas.

Release Controls: The drums are kept indoors on solid concrete until full.

History of Release: No releases have been reported for the areas.

Observations: The drums used for satellite accumulation were in sound condition and properly labeled.

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSL.

RELEASED
DATE 4/26/00
RIN # _____
INITIALS UV

ENFORCEMENT
CONFIDENTIAL

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified three SWMUs and no AOCs at the Reynolds facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the Reynolds facility and suggested further actions.

SWMU 1 Waste Storage Area

Conclusions: This area stores empty drums, drums containing nonhazardous waste, and drums containing hazardous waste. The area has a worn, stained asphalt pad. About 10 feet east of this area is a drainage ditch. Spills or storm water runoff could contaminate the drainage ditch because the unit has no berm or sump. The potential for release to specific environmental media is summarized below:

Ground Water: Moderate. Because the unit has no berm or sump, spills or storm water runoff could reach soils and eventually penetrate to ground water. A clay layer is located beneath the facility; however, it is not known if the clay is continuous throughout the facility area.

Surface Water: Moderate. Because the unit has no berm or sump, spills or storm water runoff could reach the drainage ditch and contaminate the water in it.

Air: Low. An air release could only occur if there was a severe spill. Because the amount of waste kept in the area is small, the potential for a release to air is low.

On-Site Soils: Moderate. Because the unit has no berm or sump, spills or storm water runoff could reach on-site soils.

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TABLE 3
SWMU SUMMARY

<u>SWMU</u>	<u>Operational Dates</u>	<u>Evidence of Release</u>	<u>Suggested Further Action</u>
1. Waste Storage Area	1972 to present	None	Reynolds should provide adequate containment for waste storage. Soils in the vicinity of the unit should be sampled and analyzed for hazardous constituents.
2. Wastewater Treatment Plant	1972 to present	Reynolds has had limited violations of its NPDES permit parameters.	Sediment samples should be collected from the Walnut Creek near NPDES outfall 001. Samples should be analyzed for hazardous constituents.
3. Satellite Accumulation Areas	Early-1980s to present	None	No further action is recommended.

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DATE 4/28/00
RIN #
INITIALS CAV

Recommendations: PRC recommends that Reynolds provide sufficient containment for waste storage to prevent spill and storm water runoff releases. Soils in the vicinity of the unit should be sampled and analyzed for hazardous constituents.

SWMU 2 Wastewater Treatment Plant

Conclusions: This unit is located on the south side of the Reynolds manufacturing building. The plant is used for treatment of caustic wastewater and sanitary wastewater. Reynolds has had limited discharge problems - most problems have involved operation and testing procedures. The potential for release to specific environmental media is summarized below:

Ground Water: Low. Because the retention tanks are lined and inspected regularly, the potential for release to ground water is low.

Surface Water: High. Reynolds has had ongoing violations of its NPDES permit.

Air: Low. Because the wastewater has low volatility, the potential for release to air is low.

On-Site Soils: Low. Because of the design of the unit, the potential for release to on-site soils is low.

Recommendations: Reynolds has had ongoing violations of its NPDES permit. Sediment sampling should be performed in Walnut Creek in the vicinity of NPDES outfall 001, and the samples should be analyzed for hazardous constituents.

SWMU 3 Satellite Accumulation Areas

Conclusions: Reynolds uses 55-gallon, steel drums for satellite accumulation. The drums are monitored regularly and moved to the waste storage area (SWMU 1) when full. The potential for release to environmental media is summarized below:

RELEASED
DATE 9/24/00
RIN # 23
INITIALS DAV

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Ground Water: Low. The satellite accumulation areas are indoors on solid concrete.

Surface Water: Low. The areas are not near any wastewater or surface water receiving areas.

Air: Low. The drums in the satellite accumulation areas are kept closed.

On-Site Soils: Low. The areas are indoors on solid concrete.

Recommendations: No further action is recommended at this time.

RELEASED
DATE 4/26/00
RIN # _____
INITIALS CEV

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CONFIDENTIAL

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- National Flood Insurance Program, 1978. Flood Insurance Rate Map, City of Ashville, Ohio.
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- ODNR, 1991. Pickaway County, Ohio, Well Drilling Logs.
- Ohio Environmental Protection Agency (OEPA), 1974. NPDES Permit Program Joint Public Notice, February 19.
- OEPA, 1984. Laura Burden, Preliminary Assessment of Reynolds Facility, April 6.
- OEPA, 1985. Letter to Reynolds Concerning Sampling Done in May, August 1.
- OEPA, 1986a. Letter Concerning January Pollution Incident and Test Methods for Chromium, February 19.
- OEPA, 1986b. Letter Concerning January Inspection, March 13.
- OEPA, 1986c. Letter to Reynolds Concerning NPDES Violations, March 27.
- OEPA, 1986d. Inspection Report, March 30.
- OEPA, 1986e. Reynolds Authorization to Discharge, March 31.
- OEPA, 1986f. Modification Worksheet for NPDES, August 29.
- OEPA, 1990a. Reynolds Violation of TSS, October 17.
- OEPA, 1990b. Reynolds Violation of BOD, July 19.
- OEPA, 1990c. Compliance Evaluation Inspection of Reynolds, January 18.
- OEPA, 1991a. Water Quality Test for Walnut Creek.
- OEPA, 1991b. Robert Almquist, Telephone Conversation with Kimberly Jenkins, PRC, August 8.
- OEPA, 1991c. Water Quality Based Effluent Limits Report for Reynolds, January 16.

Reynolds Metals Company (Reynolds), 1976. Letter to EPA Concerning a Release in October, October 15.

Reynolds, 1979. Reynolds Metals Company Blueprints of the Facility.

Reynolds, 1982. Revised Part A Permit, August 17.

Reynolds, 1986. Reynolds Appeal to NPDES Hexavalent Chromium Limitation, April 29.

Reynolds, 1989. Report to OEPA Discussing Wastewater Treatment Plant, April 27.

U.S. Department of Agriculture (USDA), 1980. Soil Survey of Pickaway County.

U.S. Environmental Protection Agency (EPA), 1984. Notification for Reynolds Change of Status, July 16.

U.S. Geological Survey (USGS), 1961. 7½ Minute Topographic Quadrangle Map, Ashville, Ohio.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12



**POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT**

I. IDENTIFICATION

01 STATE OH	02 SITE NUMBER OHD 055 352 512
----------------	-----------------------------------

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Reynolds Metals Company		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER Reynolds Road, P.O. Box 12			
03 CITY Ashville	04 STATE Ohio	05 ZIP CODE 43103	06 COUNTY Pickaway	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 39°43'45". N		LONGITUDE 82°57'55". W			
10 DIRECTIONS TO SITE (Starting from nearest public road) Take State Route 23 and exit on Route 752 East. Reynolds Road is on the left about 1 mile east on 752.					

III. RESPONSIBLE PARTIES

01 OWNER (if known) Reynolds Metals Company, L.C. Tropea		02 STREET (Business, mailing residential) 6801 West Broad Street			
03 CITY Richmond	04 STATE VA	05 ZIP CODE 23261	06 TELEPHONE NUMBER (804) 281-3971		
07 OPERATOR (if known and different from owner)		08 STREET (Business, mailing, residential)			
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER ()		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3010 DATE RECEIVED: ____/____/____ MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____/____/____ MONTH DAY YEAR <input type="checkbox"/> C. NONE					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE <u>07 / 11 / 91</u> <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): <u>PRC Environmental Management Inc.</u>			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION <u>1971</u> NA: Active BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Waste Paint, Wastewater Sludge					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION Potential for ground-water contamination. Potential for surface water contamination. Potential for on-site soil contamination.					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input checked="" type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)					
---	--	--	--	--	--

VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard		02 OF (Agency/Organization) EPA Region 5		03 TELEPHONE NUMBER (312) 886-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT Kimberly Jenkins		05 AGENCY	06 ORGANIZATION PRC EMI	07 TELEPHONE NUMBER (513) 241-0149	08 DATE <u>07 / 11 / 91</u> MONTH DAY YEAR



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE OH	02 SITE NUMBER OHD 055 352 512

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 <input checked="" type="checkbox"/> A. GROUNDWATER CONTAMINATION	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 POPULATION POTENTIALLY AFFECTED: <u>unknown</u>	04 NARRATIVE DESCRIPTION		
The waste storage area is unbermed and uncovered. Spillage or storm water run-off could run onto unprotected ground and down into the ground-water.			
01 <input checked="" type="checkbox"/> B. SURFACE WATER CONTAMINATION	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 POPULATION POTENTIALLY AFFECTED: <u>unknown</u>	04 NARRATIVE DESCRIPTION		
A drainage ditch is located about 10 feet east of the drum storage area. A mishap could cause waste to contaminate the water in the ditch.			
01 <input checked="" type="checkbox"/> C. CONTAMINATION OF AIR	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 POPULATION POTENTIALLY AFFECTED: <u>150</u>	04 NARRATIVE DESCRIPTION		
Paint waste dust is produced and volatile solvents are used. A severe mishap could affect employees of Reynolds Metals Company.			
01 <input checked="" type="checkbox"/> D. FIRE/EXPLOSIVE CONDITIONS	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 POPULATION POTENTIALLY AFFECTED: <u>150</u>	04 NARRATIVE DESCRIPTION		
Flammable solvents are used and flammable waste is produced, posing a fire risk.			
01 <input checked="" type="checkbox"/> E. DIRECT CONTACT	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 POPULATION POTENTIALLY AFFECTED: <u>150</u>	04 NARRATIVE DESCRIPTION		
Employees of Reynolds Metals Company are likely to come into contact with solvents used and waste produced.			
01 <input checked="" type="checkbox"/> F. CONTAMINATION OF SOIL	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 AREA POTENTIALLY AFFECTED: <u>unknown</u> (Acres)	04 NARRATIVE DESCRIPTION		
The waste storage area is unbermed and uncovered. Spillage or storm water run-off could run on unprotected soils.			
01 <input checked="" type="checkbox"/> G. DRINKING WATER CONTAMINATION	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____	04 NARRATIVE DESCRIPTION		
None reported. None noted during VSI.			
01 <input checked="" type="checkbox"/> H. WORKER EXPOSURE/INJURY	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 WORKERS POTENTIALLY AFFECTED: <u>150</u>	04 NARRATIVE DESCRIPTION		
Workers who work with solvents and the waste produced are likely to become exposed to harmful substances or become injured.			
01 <input type="checkbox"/> I. POPULATION EXPOSURE/INJURY	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____	04 NARRATIVE DESCRIPTION		
None reported. None noted during VSI.			

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Reynolds Metals Company
Ashville, Ohio
OHD 055 352 512

Date: July 11, 1991

Facility Representatives: Robert Johnson, Reynolds Metals Company (Reynolds), Engineer
Dave Hannahs, Reynolds, Plant Manager

Inspection Team: Peter Zelinskas, PRC Environmental Management, Inc. (PRC)
Kimberly Jenkins, PRC
Robert Almquist, Ohio Environmental Protection Agency (OEPA)

Photographer: Peter Zelinskas

Weather Conditions: Sunny, 87 °F

Summary of Activities: PRC met with Reynolds personnel at 10:18 a.m. Information regarding the visual site inspection (VSI) and facility waste generation and management was exchanged.

The facility walk-through began at 10:47 a.m. PRC and Reynolds personnel moved from the shutter line to the roll-coating paint lines.

The outside walk-through began at 11:25 a.m. PRC and Reynolds personnel moved from the waste storage area to the wastewater treatment plant.

The VSI was completed at 12:30 p.m. PRC left the facility at 12:45 p.m.



Photograph No. 1

Orientation: Northeast

Description: This is the waste storage area. The tank in the middle of the photograph was a process tank and is no longer used.

Location: SWMU 1

Date: 07/11/91



Photograph No. 2

Orientation: East

Description: This is the waste storage area.

Location: SWMU 1

Date: 07/11/91



Photograph No. 3

Orientation: South

Description: This is the region behind the waste storage area. About 10 feet to the left (east) of the chain-link fence is a drainage ditch.

Location: SWMU 1

Date: 07/11/91



Photograph No. 4

Orientation: West

Description: This is the chromium retention pond at the wastewater treatment plant (WWTP).

Location: SWMU 2

Date: 07/11/91



Photograph No. 5
Orientation: Northwest
Description: The chromium retention pond (foreground) and the caustic retention pond (background) at the WWTP.

Location: SWMU 2
Date: 07/11/91



Photograph No. 6
Orientation: Northwest
Description: This is the caustic retention pond at the WWTP.

Location: SWMU 2
Date: 07/11/91



Photograph No. 7

Orientation: Northwest

Description: The final retention pond at the WWTP. It is covered to keep sunlight out in order to prevent algae growth.

Location: SWMU 2

Date: 07/11/91

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

Reynolds Metals Company

009-C050870410

Reynolds Road

P.O. Box 12
Ashville, Ohio 43103

(614)983-2571

Thursday, July 11, 1991

10:07am Arrived at Reynolds

(met with Robert Almqvist, OEPA)

10:18am Met with Bob Johnson (Reynolds)

- Plant Engineer

- Explained site visit to Mr Johnson

- Met Dave Hannahs

- Plant Manager

Approx. ONE - 200 yd roll away/bunks
waste generated

(1)

10:47 - Began Site Walk
126,394 acres

Thru.

- The production part of the facility is surrounded by a chain-linked fence with barb wire on the top. The fence is locked. Everytime the gate opens a picture is taken

10:53 - Entered gate

- Shutter Lines
(permit K016500045K008)
- Shutter made from nitrogen foam.
- Go thru a
Tri-chloroethane paint system.
system generates dust
[(C) ORM-A]
- odor detected -
- Closed process
- Bad Shutters are blended up and put back in process.

- Store paint in containers (product)
- Take to painting room when they need to use it. (Pump it out)

- Bulk tank paint storage (product)
- In good shape
- Clean out pot in barrel and taken outside.

CAROME

11:07 a.m. - Cleaner

- Containment area
- where waste stream is generated.

1.5 gallons discharged per minute.

- Caustic Generation
Containment area
- odor detected

(3)

(2)

- If there is an overflow it is handled by filtration

- Caustic waste stream is the result of cleaning metal

- Drain plugged in case of a spill.

A Dam separates two rinses (Caustic and Caustic)

- Roll Coating (Up stairs)

- odor detected
- Air release area
- Exhaust duct goes to incinerator up stairs.

- Roll Coating (Down stairs)

- odor detected
- paint waste begins when rollers are cleaned

11:20

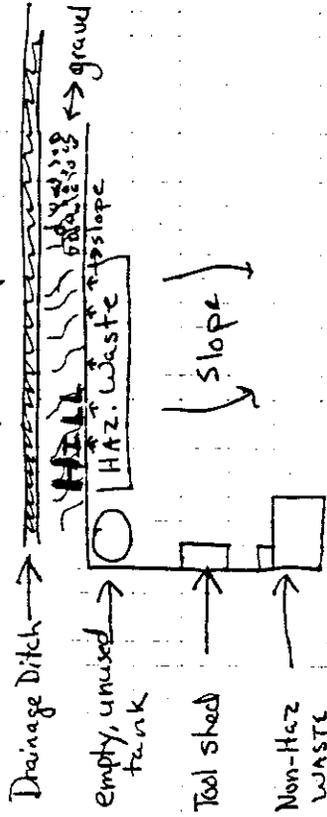
4

- Remove in bulk trucks (most)
- Remove rest in drums
- pump 85% backwash (liquid)
- Label it take it outside to storage area.

11:25

Outside

Drum storage area on blacktop, which is in poor shape.



- Blacktop sloped towards Drainage ditch and away from drainage ditch

5

- Stressed Vegetation, which could be due to several reasons: lack of sunlight, etc.

- everything is brought here for determination.

- Haz

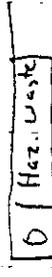
- Non-Haz

- empty

- Drums stacked 3 ~~star~~ levels high.

- Some were on wooden pallets

- Drums were metal and plastic

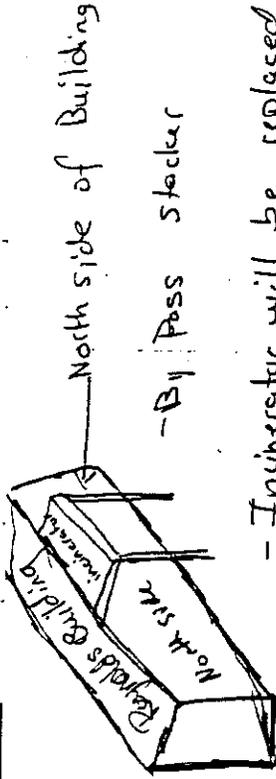


Non-Haz



← returnable drums
3 levels high

(6)



- By Boss stacker

- Incinerator will be replaced
11:35am - August 17, 1991 by
CDM in Delaware

- Drainage ditch on west side
of the building

11:42 am

- Chrome pond not used
- Found a tear in liner July 10, 1991
- Inspected Daily
- Influent pond

- Mobile Power Wash
Pumped enough waste out
to repair liner
- waste temporarily being
stored in 3 tanks.

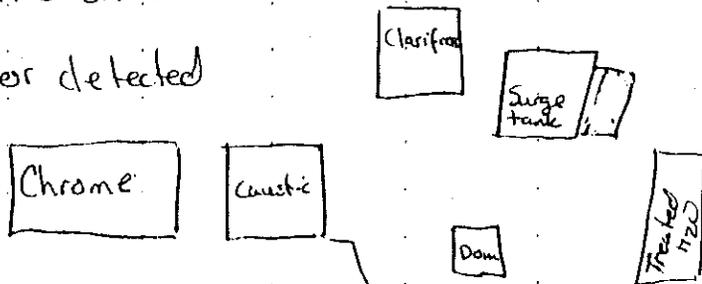
- Going to close Chrome pond

(7)

Been having BOD problems

To fix they have been taking
H₂O in plant recirculating into
industrial waste

- odor detected



- about 6 1/2 ft deep
60x60 ft
5100 gallons

- Keep pH at about 10.5 and
add lime to control the
algae.

- Built:

- Sinder block, which has
steel rods in it, goes down
to slab of concrete.
- lined
- 60 mill re-enforced hypaline

(P)

- Chrome pond has been inactive
- Process when closure starts

12:00 pm

- Surge Tank -

- weir area
- determine flow
- determine how to treat

- acidize and add lime slurry
(sulfuric acid)
to adjust the pH

12:03

Clarifiers

- Add Coagulant
- Nalco phenilite
- Nalco flocculant

- Change pH if needed
- If everything runs right they
don't have to change it

- Changed cleaner July 10, 1991

(9)

- Cover Day Pond to take away sunlight

- Pump Sludge Away

- Decanted water goes to pond

- filter and dewater

- water goes back to pond

- They do their own pH testing

- Self test - spectrometer

- Official test:

check COD to get results for BOD

Take pH from incoming (weir) and at finish

12:13

Roller
20 cubic yards

(10)

DAY POND

Final treated water

- Always keep at 2ft

- Clean every 2 to 3 years

- Cover to prevent Algae

Bulk tanks

- Fire Haz. Tanks

Drums from Oil and Grease from Sumps

- Profile and dispose

12:25

Caustic clean → rinse →
Chrome conversion coating

Vertical spray

- Stopped using year ago

12:45 - Left Plant

ROBERT G. JOHNSON

Plant Engineer
Construction Product Division
REYNOLDS METALS COMPANY



Reynolds Road
Ashville, Ohio 43103
(614) 983-2571

Feb.
365



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

RECEIVED APR 08 1991
WMD RCRA
RECORD CENTER *amp*

REPLY TO ATTENTION OF:

5HR-12

July 3, 1991

Mr. Robert Johnson
Reynolds Metals Company
Reynolds Road
P.O. Box 12
Ashville, Ohio 43103

Re: Visual Site Inspection
Reynolds Metals Company
Ashville
OHD 005 352 512 *X*

Dear Mr. Johnson:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA). The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern, and to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

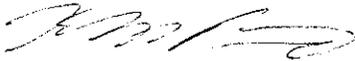
The VSI has been scheduled for July 11, 1991, at 10:00 a.m. The inspection team will consist of Kim Jenkins and Pete Zelinkas of PRC Environmental Management, Inc., contractors for the U.S. EPA. Your cooperation in admitting and assisting them while on site is appreciated.

Mr. Robert Johnson
Page 2

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests, or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions portion may be made available upon request.

Sincerely yours,



Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

cc: Robert Almquist -Columbus, Ohio
David Sholtis, Ohio EPA - Columbus
Edward Kitchen, Ohio EPA - Columbus